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Attorneys for Qwest Corporation

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE GENERIC INVESTIGATION INTO US WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS.

DOCKET NO. T-00000A-00-0194

NOTICE OF FILING

NOTICE IS HEREBY GIVEN that the Exhibits to Qwest Corporation's Exceptions to

Administrative Law Judge's Recommended Opinion and Order are filed herewith.

DATED this 12th day of December, 2001.

Arizona Corporation Commission
DOCKETED

DEC 1 2 2001

DOCKETED BY

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EXHIBIT

A

Issue	ALJ Recommendation	Rationale for Change	Action Required
[1] Customer Location Data:	The ALJs did not	Arizona is one of the fastest growing states in the	The Commission should bring the
	address this issue.	country. For example, wire centers such as	1997 customer location information
In adopting the CLECs' application of		Pinnacle Peak grew from 32,421 to 46,797 lines.	up to date by assuming a geographic
the HAI model, the ALJs estimated		The ALJs falsely assume that all telephone	expansion of the customer base
the average loop cost by comparing		customers continue to live and work in the same	proportionate to the increase in the
1997 customer location data with 2000		geographical areas as they did in 1997.	line-count data, while taking into
line count data, even though the line		 That growth would require an efficient carrier 	account the percentage of today's
count in 2000 exceeded the line count		to place additional distribution or feeder	lines that are second lines.
in 1997 by approximately 500,000		facilities to the geographic expansion	
working lines, or some 20%. That		associated with business and residential	This would increase monthly loop
chronological mismatch significantly		development since 1997.	costs by \$1.29
understates the average loop cost,		 Increasing the number of lines while ignoring 	
because it systematically ignores the		the additional cost of distribution and feeder	
costs of deploying loops to Arizona's		facilities to serve those lines dramatically	
many areas of recent suburban growth.		decreases the per loop costs the model	
		produces.	- Valoritation of

[2] Treatment of Digital Lines for	The ALJs adopted the	As the CLECs' own witness in this proceeding	The Commission should adopt
Line-Count Purposes.	partially corrected	indicated, there is no coherent basis for carving out	Qwest's line count, which properly
	approach of the HAI	an arbitrary subset of business access lines from the	counts all access lines on a physical
The only reason to consider high-	model, treating certain	scope of the HAI model's adoption of a physical	pair basis. This would recognize an
capacity loops at all in estimating the	business access lines on	pair approach to all other access lines.	increase in average loop cost in the
cost of ordinary narrowband loops is	a channel-equivalent		amount of \$.58.
the possibility that there may be some	basis but all other		
economies of scale associated with	access lines on a		
placing the cables for DS1 and DS3	physical-pair basis.		
circuits at the same time as cables for			
narrowband loops. That impact varies			
with the number of physical DS1 and			
DS3 cables that cover the same routes			
as narrowband loops, not with the			
number of transmission "channels"			
carried over those cables. Early			
versions of the HAI model adopted			
this inappropriate "channel			
equivalent" approach. Proponents of			
the Model have corrected some of the			
errors, but have not completed the			
necessary adjustments in this version,			
5.2. The CLECs' run of the HAI			
model in this case still includes some			
digital business lines, such as those			
used for ISDN Primary Rate service,			
on a channel-equivalent basis.			

Summary of Exceptions

	[3] Minimum Spanning Tree	The ALJs rejected the
	(MSI):	HAI Model's default
	The default setting in the HAI model	setting and turned on
	uses a standard backbone-and-branch	the MST function.
	design similar to the one used by	
	engineers when designing distribution	
	lines to serve a given geographic area.	
	The HAI model also contains an	
-	alternative mapping algorithm known	•
	as "minimum spanning tree," or	
	"MST." That algorithm uses a "least	
_	squares" function to find the shortest	
	right-angle distance for placing lines	
	to serve customer locations, ignoring	
	real-world obstacles, such as buildings	
	and yards, in the process.	

The default backbone-and-branch approach
reflects real world network design, in which
distribution cables travel along rights of way
and avoid obstructions such as houses, office
buildings, and yards.

The MST approach selects the shortest right angle distance between two points, ignoring existing rights of way and assuming away obstacles (buildings, schools and homes) that may exist along the path selected.

The ALJ Recommendation speculates that MST's other characteristics might offset the impact of its failure to take obstacles into account. But the ALJs cite no basis for that speculation, and the evidence is precisely to the contrary. Studies have shown that the MST approach dramatically understates the amount of distribution needed to serve customers, from roughly 20% in rural areas to as much as 50% in downtown urban areas.

The Commission should turn the MST function off. If the ALJs' customer location error is not corrected, turning MST off would increase the average loop cost by	a.95.
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Summary of Exceptions

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"Structure sharing" addresses the extent to which a carrier would save on cable placement costs by sharing them with other utilities, such as cable and power companies, that wish to place their own facilities into the ground at the same time. (Note: The flip side of a "savings" percentage is the percentage of costs that a carrier is assumed to cover itself: if the former figure is 20%, the latter will be 80%. As a technical matter, the latter figure is the one that is plugged into the HAI model as an input.)

The ALJs adopted the rule that a carrier incurs only 50% of the cost of placing plant. Put another way, the ALJs assumed that every single time a carrier places facilities in the ground, some other utility will appear on the scene to split the placement costs down the middle.

- This assumption -- that, every time Qwest or any other carrier digs, it can find some other utility willing to share the costs 50-50 -- is flatly contradicted by the evidence and is irrational.
- Qwest's actual experience is that other entities share in the costs of placing buried facilities only 20% of the time: i.e. Qwest incurs 100% of loop costs 80% of the time. Even that figure overstates the level of sharing in a replacement network, because it typically reflects placement activities only in growth environments.
- The ALJs sought to inflate sharing percentages, and thereby decrease loop costs, by assuming that developed areas are undeveloped and that other utilities have therefore not yet placed their own facilities into the ground. That approach squarely contradicts TELRIC, which requires an inquiry into the costs of replacing the network today, given the constraints in the rest of the world outside the network.
- Ex E is a comparison of the percentage of total placement costs paid by the incumbent LEC in various state and Federal dockets.

The Commission should adopt Qwest's proposed sharing ratios.
That would increase the average loop cost by \$1.96. Alternatively, the Commission should adopt, at a bare minimum, the sharing ratios in the FCC's *Inputs Order*. That would increase the average loop cost by \$1.04

[5] Placement Costs:	The ALJs adopted the	•	The ALJs' inputs understate the cost of placing	The Commission should adopt
The vast majority of cable needs to be	CLEC-sponsored HAI		amount of plowing and trenching that could be	Alternatively, the Commission should
dispute about cable placement costs	model.		used to place below-ground lines in those areas. In effect, the ALJs assume that carriers	adopt an average of Qwest and HAI numbers which increase monthly loop
concerns the relative frequency among			can plow through asphalt. As with structure	costs by \$.66
that an efficient carrier would use to			snaring, are ALDS appear to accept the CLECS argument that the question is not how much it	
cut through the ground to lay the			would cost to deploy facilities now in the	
cable. "Plowing" and "trenching" are			world as it currently exists outside the	
relatively inexpensive and are used in			network, but how much it would have cost to	
and "boring" are more expensive and			development times. That approach is squarely	
are used in more developed areas			inconsistent with TELRIC.	
(where, for example, asphalt makes				
plowing impossible).			The second secon	
[6] General Support Assets:	By applying an	•	The HAI model more than removes any	The Commission should shut off the
	arbitrary "allocator" in		portion of general support costs attributable to	HAI model's "allocator" function.
Support assets include, among other	the HAI model, the		retail operations without the futher 50%	That would increase loop costs by
things, computers, work vehicles, and	ALJs cut in half the		deduction.	\$1.04.
garage and work equipment. The cost	general support costs	•	General support assets do not contain any	
of general support assets is distributed	recovered through		"retail only" expenses; they are attributed to	
over 100% of a carrier's plant,	UNEs, essentially		each retail and wholesale loop, and there is no	
including loops used by retail	double counting the		need to allocate them further with a special	
customers and loops leased as UNEs	portion of costs		reduction.	
to CLECs. When a retail customer	attributable to retail	•	Qwest has spent hundreds of millions of	
chooses a CLEC as its provider, it no	expenses.		dollars to upgrade its computer systems solely	
it therefore no longer pays the portion			for the purpose of providing CLECs access to	
of the retail rate designed to recover			west's existing systems, making a reduction in these expenses allocated to wholesale loops	
the costs of general support assets.			even less logical.	
Those costs therefore follow the loop			,	
to the wholesale side.				the section of

The Commission should adopt Owest's proposals for nonrecurring	charges. At a minimum, the Commission should adopt charges no	lower than those proposed by Staff.																	
The CLEC model adopted by the ALJs assumes a 98% flow-through rate even though	the CLECs' own witness testified that no ILEC could possibly attain that standard, and it then	assumes away many of the provisioning	activities necessary to connect Qwest's	network elements to a CLEC's network or	customers.	Although the CLECs appear to claim that their	model includes some non-recurring costs in	recurring charges, the already low recurring	rate offered by the CLECs suggests that any	such recovery is miniscule.	In adopting the CLEC-sponsored model, the	ALJs appear to have overlooked the need to set	nonrecurring costs for many activities, such as	"hot cuts," and the provision of the UNE	platform over lines not currently in use.				
The ALJs adopted the CLEC sponsored NRC	model.					•					•								
[7] Non-Recurring Costs.	Non-recurring charges are the up-front charges imposed on CLECs for the	one-time provisioning costs an ILEC	incurs in conducting the ordering and	provisioning functions necessary to	make its network elements available to	CLECs. FCC rules require full	compensation for incurred non-			The non-recurring cost model	sponsored by the CLECs assumes that	virtually all ordering and network	provisioning functions can be handled,	without human involvement, through		This chart gives only a summary of the	nonrecurring charge dispute; for a	more detailed list of the charges at	issue, see Exhibit G.

[8] Campus Wire.	The ALJs adopted the	•	The Commission cannot properly require the	The Commission should accept
	Cox position.		costing of a new UNE such as campus wire (or	Qwest's costs for intrabuilding cable
"Campus wire" consists of the outside			"on-premises" wire) without conducting a	in this proceeding. Cox's proposal
distribution lines that serve multiple			proceeding to determine the need for such a	should be considered, if at all, in a
buildings on a single property, such as			UNE	new case focused on deciding
an apartment complex or a college		•	Qwest had no notice of such a proceeding or	whether to create a campus wire (or
campus. These facilities are simply a			an opportunity to present a case against it	"on-premises" wire) UNE.
species of subloop distribution plant,		•	The record contains no cost support for an	
and their costs are blended in with the			averaged campus-intrabuilding wire rate	
costs of non-campus distribution		•	Separating campus wire from the subloop and	
facilities to produce the forward-			pricing it at the lower rate for intrabuilding	
looking cost of the subloop generally.			cable would increase the cost of both the	
Cox has proposed that campus wire be		_	subloop and building wire.	
detached from the subloop UNE and			, , , , , , , , , , , , , , , , , , ,	
priced the same as "intrabuilding				
cable." The ALJs, in effect, created a				
brand new UNE, dubbed "on-premises				
wire," that combines campus wire				
with intrabuilding cable. Neither				
Qwest nor Cox provided any cost				
evidence substantiating the proposition				
that campus wire should be priced the				
same as intrabuilding cable.			The state of the s	

EXHIBIT B B

EXHIBIT B Ordered Loop Rates

Comparison of Orders in Qwest Dockets

	Docket No.	ROO	Ordered Rate
ALJ Recommended Order			
AT&T Compliance Run		\$ 12.13	
Qwest Compliance Run		\$ 14.54	

Ordered Rates Other Qwest States

Colorado	96S-331T	\$ 18.00
Idaho	USW-T-96-15	\$ 25.52
lowa	RPU-96-9*	\$ 20.15
Minnesota	CI96-1540	\$ 17.87
Montana	D2000.6.89	\$ 28.37
Nebraska	C-1385	\$ 15.79
New Mexico	96-310TC	\$ 20.50
North Dakota	PU-453-96-497	\$ 19.75
Oregon	UM844*	\$ 15.00
South Dakota	TC 184/TC99-106	\$ 21.09
Utah	94-999-01	\$ 16.46
Washington	UT-960369	\$ 17.61
Wyoming	70000-TF-96-319	\$ 25.65

^{*} Loop rate ruling reversed on Appeal by AT&T and Qwest. Court remanded issue to Commission for further findings.

EXHIBIT

C

EXHIBIT C

RESIDENTIAL COMPETITION CAN DEVELOP WITH AN \$18 LOOP RATE

The Arizona Corporation Commission Staff has taken the position that to the extent comparisons of cost to retail revenues are relevant, those comparisons should include revenue from services in addition to basic local exchange service:

"The average residential telephone bill per line is \$55 per month nationwide. The bill for basic exchange service is approximately 25% of that total. A rational telephone company executive would consider the entire family of revenues that would be generated by installing those facilities as part of the decision to install them. There is no evidence that as part of this decision, the revenues derived from the loop facilities for services other than basic exchange service are ignored. No rational analysis would ignore those revenues." (Direct Testimony of William Dunkel, Arizona Corporation Commission Docket No. T-0105B-99-0105 Rate Case, August 2000, page 47.)

Average Qwest Residential Revenue in Arizona

Basic exchange Subscriber Line Charge IntraLATA Toll Access (Interstate & Intrastate)	\$ 13.18 \$ 5.00 \$ 1.00 \$ 7.00	Custom Choice \$ 32.95 \$ 5.00 \$ 1.00 \$ 7.00
Features	\$ 5.00	(Included Above)
Total Revenue	\$ 31.18	\$ 45.95
UNE Platform (At an \$18 Loop with other Qwest Pro	Zone 1 posed Rates)	Statewide Average
Loop	\$ 13.97	\$ 18.00
Port	\$ 2.45	\$ 2.45
Local Switching	\$ 4.15	\$ 4.15
Shared Transport	<u>\$ 1.36</u>	<u>\$ 1.36</u>
Total UNE Platform	\$ 21.93	\$ 25.96
Gross Margin Average Features	Zone 1	\$ 9.25
Gross Margin Custom Choice Z	Zone 1	\$ 24.02
Gross Margin Average Features	Statewide	\$ 5.22
Gross Margin Custom Choice S	tatewide	\$ 19.99

EXHIBIT D

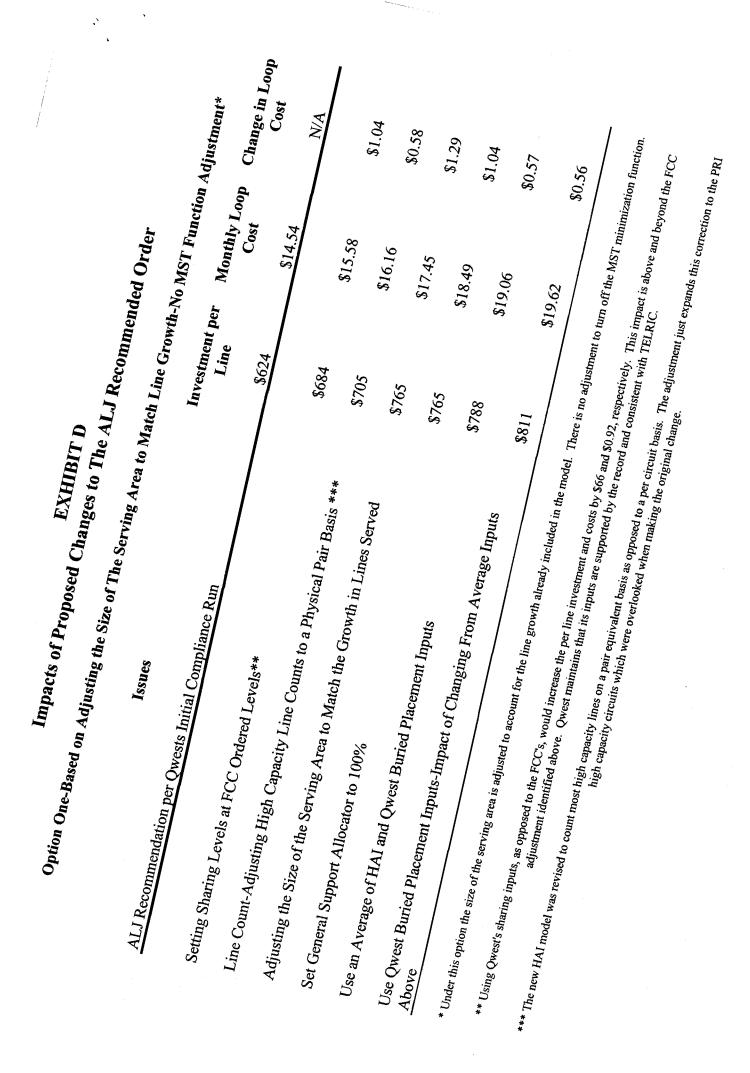


EXHIBIT D Impacts of Proposed Changes to The ALJ Recommended Order

Option Two-Based on Turning Off the MST Minimization Function with No Location Adjustment*

	Investment per Line	Monthly Loop Cost	Change in Loop Cost
Issues	\$624	\$14.54	N/A
Setting Sharing Levels at FCC Ordered Levels**	\$684	\$15.58	\$1.04
Line Count Adjustment-Adjusting High Capacity Line Counts to a Physical Pair Basis	\$705	\$16.16	\$0.58
Turn Off the Least Squares MST Function	\$749	\$17.09	\$0.93
Set General Support Allocator to 100%	\$749	\$18.10	\$1.01
Use an Average of HAI and Qwest Buried Placement Inputs	8776	\$18.76	\$0.66
Use Qwest Buried Placement Inputs-Impact of Changing From Average Inputs Above	\$802	\$19.41	\$0.65

^{*} Under this option there is no adjustment to increase the size of the serving area for the increase in the number of lines being served. As an alternative, the MST minimization function has been turned off.

^{**} Using Qwest's sharing inputs, as opposed to the FCC's, would increase the per line investment and costs by \$66 and \$0.92, respectively. This impact is above and beyond the FCC adjustment identified above. Qwest maintains that its inputs are supported by the record and consistent with TELRIC.

^{***} The new HAI model was revised to count most high capacity lines on a pair equivalent basis as opposed to a per circuit basis. The adjustment just expands this correction to the PRI high capacity circuits which were overlooked when making the original change.

EXHIBIT

F

EXHIBIT E
Cost Savings Achieved By Sharing Placement Costs with Other Entities

Comparison of FCC Rulings and Orders in Cost Dockets in Qwest Region

	Underground	Buried	Aerial
ALJ Recommended Order	50%	50%	50%
FCC Ordered Sharing (Inputs Order -11/2/99)			
Density of 0 to 4 Customers Per Mile	0.00%	0.00%	50.00%
Density of 5 to 99 Customers Per Mile	0.00%	0.00%	50.00%
Density of 100 to 199 Customers Per Mile	15.00%	15.00%	50.00%
Density of 200 to 649 Customers Per Mile	35.00%	35.00%	50.00%
Density of 650 to 849 Customers Per Mile	35.00%	35.00%	50.00%
Density of 850 to 2549 Customers Per Mile	35.00%	35.00%	50.00%
Density of 2550 to 4999 Customers Per Mile	45.00%	45.00%	65.00%
Density of 5000 to 9999 Customers Per Mile	45.00%	45.00%	65.00%
Density of more Than 10000 Customers Per Mile	45.00%	45.00%	65.00%
Colorado Cost Docket Order - 7/16/97			
All Density Groups	20% - 30%	20% - 30%	No Order
lowa Cost Docket Order - 4/23/98			
All Density Groups	25%	30%	50%
Minnesota Cost Docket Order - 5/3/99			
All Density Groups	33%	33%	33%
New Mexico Cost Docket Order - 7/15/98			
All Density Groups	10%	30%	60%
Oregon Cost Docket Order -			
All Density Groups	No Order	35%	No Order
Washington Order - 5/11/98			
All Density Groups-Qwest Model	30%	24%	No Order

All figures listed above represent the percent of placement costs that will be paid by a company other than Qwest. The inputs into the model are the amount of costs to be recovered through Qwest's UNE rates or the reciprocals to the amounts listed above. For instance, in Iowa we show a 30% cost savings factor. This means that the Iowa commission assumed that Qwest will reduce its costs of placing facilities by 30% by shating with other companies. The remainder of the cost - 70% - would be paid by Qwest. It is the amount that Qwest will pay (i.e. 70%) that would be the input into the HAI model.

EXHBIT F

EXHIBIT F
Nonrecurring Rate Comparison

Ordered in Cost Dockets in Qwest States Compared to Position of Parties in Docket No. T-00000A-00-0194

		ALJ**	Qwest	est	Staff		AI&I**		3	CO-New*	3	⊴	*N	M	н	MN	>	WA**
Loop Installation																		
Basic Installation First Each Additional	~ ~	3.23	8 F	88.29 76.07		6 6	3.23	<i>.</i>	70.00	\$ 87.74	↔ ↔	46.01 \$	4.33	↔ ↔	89.88 \$ 77.44 \$	58.71 58.71	↔ ↔	51.94 51.11
Coordinated No Cooperative Testing First Each Additional			9 89 8 89	95.38 83.16	\$ 58.18 \$ 50.73	დ ღ	3.23							о ю •	97.09 \$ 84.65 \$	\$ 106.17 \$ 106.17		
Basic with Testing First Each Additional			\$ 19.	192.29	\$ 117.30 \$ 84.16	\$ 08 9	3.23	<i>\$</i> \$	112.00		↔ ↔	68.16 68.16		\$ \$ 10	195.75 \$	\$ 106.17 \$ 106.17	↔ ↔	126.15 82.70
Coordinated with Cooperative Testing First Each Additional			\$ 23	232.25	\$ 141.67 \$ 84.16	\$ 29	3.23	<i>.</i>	142.00 90.00	\$ 229.33	÷ ÷	105.31 105.31		\$ 23 14	236.43 \$ 140.45 \$	\$ 106.17 \$ 106.17	⇔ ↔	179.14 135.68
High Capacity Circuit Installation																		
Entrance Facilities DS1 DS3	« «		\$ 213 \$ 410	219.79 \$	\$ 134.07 \$ 134.07	\$ 20 24 25 26 26 26 26 26 26 26 26 26 26 26 26 26	1 1	<i>.</i>	482.00 528.93	\$ 359.00	↔ ↔	405.93 \$	12.85	↔ ↔	310.02 \$	\$ 219.34 \$ 415.22	↔ ↔	545.99 653.75
Direct Trunk Transport - UDIT DS0 DS1	••	8.13 8.13	\$ 35	355.22 362.03	\$ 216.68 \$ 220.84	86 47 8-8-	8.13			\$ 365.00	↔ ↔	187.27 \$ 220.80 \$	12.85	↔ ↔	313.49 359.28			

Blanks indicate no order or proposal on the rate

^{*} Preliminary bench ruling ** Combined connection charge. For instance, the loop NRC of \$3.23 is a combined connection charge and a \$1.53 disconnection charge.

EXHIBIT

G

EXHIBIT G

Rate Comparison Including List of Unresolved Rates*, Docket T-00000-00-0194

	QWI Pricing F			Worldcom/XO Proposal		Staff Proposal	ALJ Recon	nmended	
	Recurring	NRC	Recurring	NRC	Recurring	NRC	Recurring	NRC	ROO Decision
NTERCONNECTION									
Entrance Facilities DS1	\$86.70	\$219.79	\$0.00	\$0.00	\$52.89	\$134.07		\$0.00	Included in Direct Trunked Transport
DS3	\$458.43	\$416.07	\$0.00	\$0.00	\$279.64	\$134.07		\$0.00	Included in Direct Trunked Transport
Direct Trunked Transport									
DSO		İ			**		1		
DS0 Over 0 to 8 Miles - Fixed			\$12.40		**		\$49.74		HA! Compliance Run
DS0 Over 0 to 8 Miles - per mile DS0 Over 8 to 25 Miles - Fixed	i		\$0.06 \$12,41		**		\$0.00 \$49.74		HAI Compliance Run HAI Compliance Run
DS0 Over 8 to 25 Miles - per mile		1	\$0.06		**		\$0.00		HAI Compliance Run
DS0 Over 25 to 50 Miles - Fixed DS0 Over 25 to 50 Miles - per mile	i		\$12.43 \$0.05		**		\$49.74 \$0.00		HAI Compliance Run HAI Compliance Run
DS0 Over 50 Miles - Fixed			\$12.41		**		\$49.74		HAI Compliance Run
DS0 Over 50 Miles - per mile			\$0.03		**		\$0.00		HAI Compliance Run
DS1 Over 0 to 8 Miles - Fixed	\$31.14		\$21.22		**		\$143.54		HAI Compliance Run
DS1 Over 0 to 8 Miles - per mile DS1 Over 8 to 25 Miles - Fixed	\$1.45 \$31.40		\$0.86 \$21.38		**		\$0.00 \$143.54	i	HAI Compliance Run HAI Compliance Run
DS1 Over 8 to 25 Miles - per mile	\$1.18		\$0.70		**		\$0.00		HAI Compliance Run
DS1 Over 25 to 50 Miles - Fixed DS1 Over 26 to 50 Miles - per mile	\$31.87 \$2.14		\$21.66 \$1.27		- :		\$143.54 \$0.00		HAI Compliance Run HAI Compliance Run
DS1 Over 50 Miles - Fixed	\$31.83		\$21.64				\$143.54		HAI Compliance Run
DS1 Over 50 Miles - per mile	\$1.12		\$0.67		**		\$0.00		HAI Compliance Run
DS3 Over 0 to 8 Miles - Fixed	\$197.32		\$142.72		**		\$1,700.22		HAI Compliance Run
DS3 Over 0 to 8 Miles - per mile	\$61.17 \$200.35		\$42.03 \$142.69		**		\$0.00 \$1,700.22		HAI Compliance Run
DS3 Over 8 to 25 Miles - Fixed DS3 Over 8 to 25 Miles - per mile	\$200.35 \$18.78		\$142.69 \$13.70	i i	**		\$1,700.22 \$0.00		HAI Compliance Run HAI Compliance Run
DS3 Over 25 to 50 Miles - Fixed	\$184.41		\$133.59		".		\$1,700.22		HAI Compliance Run
DS3 Over 25 to 50 Miles - per mile DS3 Over 50 Miles - Fixed	\$23.73 \$194.79		\$16.22 \$140.93		**		\$0.00 \$1,700.22		HAI Compliance Run HAI Compliance Run
DS3 Over 50 Miles - per mile	\$16.34		\$11.00				\$0.00		HAI Compliance Run
Multiplexing	1 . 1								
DS3 to DS1 per system	\$232.15	\$268.62	\$137.80	\$114.80	\$141.61	\$163.86			Not addressed in Order
Local Traffic	\$0.002143		\$0.00121		\$0.00149	l			N/A Next Phase
End office call termination, per minute of use Tandem Switched Transport	\$0.002143		\$0.00121		\$0.00149				N/A Next Filase
Tandem switching, per minute of use	\$0.001589		\$0.00052		\$0.00057				N/A Next Phase
Tandem Transmission	1					1			
Over 0 to 8 Miles - Fixed, per mou Over 0 to 8 Miles - per mile	\$0.000456 \$0.000043		\$0.000000				\$0.00077 \$0.00000		HAI Compliance Run HAI Compliance Run
Over 8 to 25 Miles - Fixed, per mou	\$0.00045		\$0.000000		"	ł	\$0.00007		HAI Compliance Run
Over 8 to 25 Miles - per mile	\$0.000021		\$0.000000				\$0.00000		HAI Compliance Run
Over 25 to 50 Miles - Fixed, per mou Over 25 to 50 Miles - per mile	\$0.000448 \$0.000011		\$0.000000 \$0.000000			İ	\$0.00077 \$0.00000		HAI Compliance Run HAI Compliance Run
Over 50 Miles - Fixed, per mou	\$0.000433		\$0.000000		:	- 1	\$0.00077		HAI Compliance Run
Over 50 Miles - per mile	\$0.000004		\$0.000000		"		\$0.00000		HAI Compliance Run
Trunk Nonrecurring Charges DS1 Interface, First Trunk		\$355.22		\$7.60	į	\$216.68		\$7.60	AT&T NRC Compliance Run
DS1 Interface, Each Additional Trunk	1 1	\$5.93		\$7.00		\$3.62		\$1,00	ATA? NRC Compliance Run
DS1 Disconnect	l i	\$362.03		\$0.53 \$7.60		\$220.84			AT&T NRC Compliance Run
DS3 Interface, First Trunk DS3 Interface, Each Additional Trunk	1 1	\$302.03 \$12.75		\$7.00		\$7.78		\$7.60	AT&T NRC Compliance Run
DS3 Disconnect	1 1			\$0.53		**		\$0.53	AT&T NRC Compliance Run
DS1 Trunk Rearrangement							 		
Interconnection Tie Pairs (ITP) (Optional) Per DS0	1						\$0.46		Collocation Compliance Run
Per DS1	1		\$0.00		\$0.93		\$1.49		Collocation Compliance Run
Per DS3	1		\$0.00		\$9.35		\$15.25		Collocation Compliance Run
Channel Regeneration (Optional)	1 1								
DS1 Regneration DS3 Regneration	1 1			\$0.00 \$0.00	\$1.20 \$3.71	\$293.12 \$1,108.91			ALJ Recommended ALJ Recommended
						, ,		*****	
COLLOCATION ALL COLLOCATION	 								
Quote Preparation Fee	1		\$0.00	\$857.13		**		\$1,381.54	
Augment QPF	1 1							\$345.00	AZ Proposed QPF * .25
Collocation Entrance Facility, per fiber pair	I		.						
Standard per Fiber pair Gross Connect per Fiber	\$16.01 \$16.17	\$627.99 \$735.39	\$8.58 \$12.57	\$736.94 \$991.10	\$9.77 \$9.86	\$383.07 \$448.59	\$14.93 \$15.09	\$504.96 \$612.36	Collocation Compliance Run Collocation Compliance Run
Express per Cable	\$276.84	\$9,198.71	\$133.66	\$5,249.97	\$168.87	\$5,611.21	\$260.21	\$7,599.28	Collocation Compliance Run
Cable Splicing									
Fiber - Per Set-Up		\$476.82		\$425.66		\$290.86		\$476.82	
Per Fiber Spliced Per Splice - Copper		\$38.12		\$34.03]	\$23.25		\$38.12	Cołlocation Compliance Run
		ł							
-48 Volt DC Power Usage, per Ampere, per Month Power Plant, per amp <60 amps	\$10.94		\$9.56		\$6.67		\$10.94		ALJ Recommended
>60 amps	\$10.94	i	\$7.45		l **		\$10.94		ALJ Recommended ALJ Recommended
=60 amps	\$10.94 \$3.70		\$8.19		**		\$10.94		ALJ Recommended
Power Usage Less Than 60 Amps, per Amp Power Usage More Than 60 Amps, per Amp	\$3.70 \$7.41		\$3.31 \$6.61		\$2.26 \$4.52		\$3.70 \$7.41		ALJ Recommended ALJ Recommended
	1			.		I			
AC Power Feed (Backup Power) AC Power Feed – per Amp, per Month									l
120 V 208 V. Single Phase	\$19.03 \$32.98		\$16.85 \$29.20		\$11.61 \$20.12		\$19.03 \$32.09		Collocation Compliance Run
AVO T, GINGIO I HEGO	934.80	1	#25.20	ı	#4U.12	- "	\$32.98		Collocation Compliance Run Exhibit G - Owest Exceptions

EXHIBIT G

QWEST ACC Staff ALJ Recommended Joint AT&T/Worldcom/XO **Pricing Proposal Pricing Proposal Pricing Proposal** ROO Decision NRC NRC NRC Recurring Recurring Recurring Recurring NRC INTERCONNECTION \$57.06 \$50.52 \$34.81 \$57.06 Collocation Compliance Run 208 V. Three Phase Collocation Compliance Run \$38.06 \$33.69 \$23.22 \$38.06 240 V, Single Phase \$65.84 \$58.29 \$40.16 \$65.84 240 V Three Phase Collocation Compliance Run \$131.68 \$116.58 \$80.32 \$131.68 Collocation Compliance Run AC Power Feed, per foot per A&B Feeder \$0.0117 \$0.00714 \$0.01170 20 Amp. Single Phase \$8.02 \$0.0109 \$7.16 \$4.89 \$8.02 Collocation Compliance Run 20 Amp, Three Phase \$0.0145 \$9.94 \$0.0135 \$8.87 \$7.72 \$0.00885 \$6.06 \$0.01450 \$9.94 Collocation Compliance Run \$8.64 \$0.00769 \$8.64 30 Amn Single Phase \$0.0126 \$0.0117 \$5.27 \$0.01260 Collocation Compliance Run \$0.0173 \$11.87 \$0.0161 \$10.60 \$0.01055 \$0.01730 \$11.87 30 Amp, Three Phase Collocation Compliance Run \$10.16 40 Amp. Single Phase \$0.0149 \$10.16 \$0.0138 \$9.07 \$0.00909 \$6.20 \$0.01490 Collocation Compliance Run \$0.0204 \$13.99 \$0.0189 \$0.01244 \$8.53 \$0.02040 \$13.99 40 Amp, Three Phase \$12.06 50 Amp. Single Phase \$0.0176 \$0.0163 \$10.76 \$0.01074 \$7.36 \$0.01760 \$12.06 Collocation Compliance Run \$0.0246 \$16.84 \$0.0228 \$15.03 \$0.01501 \$10.27 \$0.02460 \$16.84 50 Amp, Three Phase Collocation Compliance Run \$13.63 60 Amp. Single Phase \$0.0199 \$0.0185 \$12.17 \$0.01214 \$8.31 \$0.01990 \$13.63 Collocation Compliance Run \$19.38 \$0.0266 \$0.01726 \$0.02830 60 Amp, Three Phase \$0.0283 \$19.38 Collocation Compliance Run 100 Amp, Single Phase \$0.0247 \$16.88 \$0.0229 \$15.07 \$0.01507 \$10.30 \$0.02470 \$16.88 Collecation Compliance Run \$0.0385 \$26.36 \$0.0357 \$0.02349 100 Amp, Three Phase \$23.53 \$0.03850 Collocation Compliance Run Inspector Labor, per Half Hou Regular Hours Rate \$32.03 \$28,60 \$32.03 Collocation Compliance Run \$41.25 After Hours Rate, minimum 3 hours Collocation Compliance Run Interconnection Tie Pairs (ITP) Per DS0 \$0.46 Collocation Compliance Run \$0.93 Collocation Compliance Run Per DS3 \$13.39 \$9.35 \$15.25 Collecation Compliance Run Channel Regneration \$0.00 \$0.00 \$293.12 \$0.00 DS1 Regenerator ALJ Recommended DS3 Regeneration \$0.00 \$0.00 \$3.71 \$1,108.91 \$0.00 ALJ Recommended Collocation Terminations - DS0 Block Termination Per Termination Cable Placement per 100 Pair Block, OR \$0.4837 \$0.4327 \$218.19 \$0.29506 \$149.10 Cable Placement per Termination \$0.0091 \$4.59 \$0.0081 \$4.09 \$0,00555 \$2.80 \$0.5567 Cable per 100 Pair Block, OR \$0.6222 \$0.3795 \$191.78 Cable per Termination \$0,0085 \$4.31 \$548.18 \$0.0076 \$3.84 \$0.00519 \$2.63 Blocks per 100 Pair Block, OR \$1.0849 \$0.7897 \$0.66179 \$334.39 Blocks per Termination \$0.01490 \$7.51 \$0.0108 \$5.45 \$0 nnanc \$4.58 Block Placement Per 100 Pair Block, OR \$226.30 \$0.30604 \$154.64 \$0.5017 \$0.4488 Block Placement per Termination \$0,0069 \$3.47 \$0.0061 \$3.10 \$0.00421 \$2.12 DS0 Terminations per 100 (Knowles) \$2.46 \$622,24 Collocation Compliance Run/Pg 14 of Knowles' testimony Collocation Terminations - DS1 Block Termination Per Termination \$0.5940 \$406.52 \$0.36234 \$247.98 Cable Placement per 28 DS1s. OR \$0.5504 \$362.90 \$43.71 \$362.96 Cable Placement per Termination \$0.0639 \$0.0592 \$39.02 \$0.03898 \$26.66 \$0.5304 \$0.4914 \$324.02 Cable per 28 DS1s, OR \$0.32354 \$221.41 \$0.0570 \$39.03 \$0.0528 \$34.84 \$369.72 \$0.03477 \$23.81 \$0,5607 Panel per 28 DS1s , OR \$0.6052 \$414.16 \$0.36917 \$252.64 Panel per Terminati \$0.0731 \$50.00 \$86.74 \$0.0677 \$44.63 \$0.04459 \$30.50 Panel Placement per 28 DS1s, OR \$0.1268 \$77.43 \$0.1174 \$0.07735 \$52.91 Panel Placement per Termination \$0.0136 \$9.33 \$0.0126 \$8.33 \$0.00830 \$5.69 DS1Unconnectorized Terminations per 28 (Knowles) \$1.69 \$595.32 Collocation Compliance Run/Pg 14 of Knowles' testimony Collocation Terminations - DS3 Block Termination Per Termination \$165.51 \$0.2419 \$0,2241 \$147.75 \$0.14756 \$100.96 Cable Placement per Termination \$0.3425 \$0.3529 \$234.38 \$209.23 \$142.97 \$0.3173 \$241.50 \$0.21527 Panel/Connector per Termination \$0.3270 \$215.58 \$147.32 Panel/Connector Placement per Termination \$0.0364 \$24.92 \$0.0337 \$370.39 Collocation Compliance Run/Pg 14 of Knowles' testimony DS3 Connectorized Termination per DS3 (Knowles) \$0.89 Per Employee, per Card \$0.86 \$0.77 \$0.52 \$0.86 Collegation Compliance Run Card Access Per employee, per Office Collocation Compliance Run Central Office Security Infrastructure Central Office Clock Synchronization Synchronization - Composite Clock, per Port \$7.42 \$6.48 \$3,12 \$7.42 Collocation Compliance Run Space Availability Report \$335.01 Per Office \$204.36 \$335.01 Collocation Compliance Run Space Option VIRTUAL \$4,399.84 \$857.13 Quote Preparation Fee \$2,683.90 \$1,381.54 ALJ Recommended Augment QPF \$345.00 AZ Proposed QPF * .25 spector Labor, per Half Hou Regular Hours Rate \$28.60 \$32.03 Collocation Compliance Run After Hours Rate \$41.25 Collocation Compliance Run Maintenance Labor, per Half Hou Regular Hours Rate \$28 10 \$25.08 \$28.10 Collocation Compliance Run After Hours Rate \$37.60 \$33.56 \$37.60 Collocation Compliance Run Training Labor, per Half Hour Regular Hours Rate \$28.10 \$25.08 \$28.10 Collocation Compliance Run Collocation Compliance Run Equipment Bay -recurring, per Shelf \$3.61 \$3.16 \$2.20 \$3.61 Engineering Labor, per Half Hour 30.3 \$27.06 Regular Hours Rate \$30.31 Collocation Compliance Run After Hours Rate 39.13 \$34.93 \$39.13 Collocation Compliance Run Installation Labor, per Half Hour Regular Hours Rate \$32.03 Collocation Compliance Run

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

•	QW Pricing I	EST Proposal		Worldcom/XO Proposal		C Staff Proposal	ALJ Recon	nmended	
		NRC	T	NRC	Recurring	NRC	Booreston	NRC	ROO Decision
INTERCONNECTION	Recurring	NRC	Recurring	NRC	Recurring	NRC	Recurring	NRC	
After Hours Rate		\$41.25		\$36.82		**		\$41.25	Collocation Compliance Run
Floor Space Lease, per Square Foot	\$3.69		\$2.87		\$2.25		\$3.56		Collocation Compliance Run
48 Volt DC Power Cables							1		
20A Power Feed, per feed	\$8.11	\$5,552.65	\$7.47	\$4,923.58	\$4.95	\$3,387.12	\$4.50	\$3,076.20	Collocation Compliance Run
30A Power Feed, per feed 40A Power Feed, per feed	\$9.27 \$11.31	\$6,343.97 \$7,739.80	\$8.44 \$9.85	\$5,567.14 \$6,491.53	\$5.65 \$6,90	\$3,869.82 \$4,721.28	\$5.29 \$6.74	\$3,622.89 \$4,610.16	Collocation Compliance Run Collocation Compliance Run
60A Power Feed, per feed	\$14.11	\$9,655.97	\$12.04	\$7,935.89	\$8.61	\$5,890.14	\$8.38	\$5,738.22	Collocation Compliance Run
CAGELESS COLLOCATION									
Quote Preparation Fee Augment QPF		\$4,399.84		\$857.13		\$2,683.90		\$1,381.54 \$345.00	ALJ Recommended AZ Proposed QPF * .25
Space Construction								\$345.00	AZ Floposed QFF .25
5 year payments (recurring for 5 yrs) on-going maintenance			\$39.80 \$2.52		**				
Space Construction (Standard 40 Amp Power Feed)									1
2 Bays and 1 - 40A Power Feed	\$43.77	\$29,953.55			\$26.70	\$18,271.67	\$27.73	\$18,979.70	Collocation Compliance Run
Adjustment for 20A Initial Power Feed	(\$3.20) (\$2.04)	(\$2,187.15)			(\$1.95)		(\$2.24)		Collocation Compliance Run
Adjustment for 30A Initial Power Feed Adjustment for 40A Initial Power Feed	(⊅∠.04) Included in Spa	(\$1,395.83) ce Construction			(\$1.24) \$0.00	(\$851.46) \$0.00	(\$1.44)	(\$987.27)	Collocation Compliance Run
Adjustment for 60A Initial Power Feed	\$2.80	\$1,916.17			\$1.71	\$1,168.86	\$1.65	\$1,128.06	Collocation Compliance Run
Adjustment for Each Additional Bay	\$4.44	\$3,038.06			\$2.71	\$1,853.22	\$4.19		Collocation Compliance Run
Each Additional 20A Power Feed Each Additional 30A Power Feed	\$8.11 \$9.27	\$5,552.65 \$6,343.97			\$4.95 \$5.65	\$3,387.12 \$3,869.82	\$4.50 \$5.29	\$3,622.89	Collocation Compliance Run Collocation Compliance Run
Each Additional 40A Power Feed	\$11.31	\$7,739.80			\$6.90	\$4,721.28	\$6.74	\$4,610.16	Collocation Compliance Run
Each Additional 60A Power Feed	\$14.11	\$9,655.97			\$8.61	\$5,890.14	\$8.38	\$5,738.22	Collocation Compliance Run
Floor Space Lease, per Square Foot	\$3.69	J	\$2.87	į	\$2.25		\$3.56		Collocation Compliance Run
Zone 1		ſ	! [1	[1		<u>'</u>
Zone 2 Zone 3									
CAGED COLLOCATION						 			[<u>-</u>
Quote Preparation Fee Augment QPF		\$4,783.90		\$857.13	1	\$2,918.18			ALJ Recommended AZ Proposed QPF * .25
Space Construction (Standard 60 Amp Power Feed)		i			j			ψ040.00	ALT TOPOSOU QT 1 .EU
Site Preparation	676.04	\$54.004.48	*co.4e		***	624 650 74	250.04	Anr 500 04	Only and the One of the One
Cage-Up to 100 Sq. Ft	\$75.84	\$51,901.16	\$68.46 \$4.34		\$46.26	\$31,659.71	\$52.01	\$35,589.64	Collocation Compliance Run
Cage- 101- 200 Sq. Ft	\$78.70	\$53,858.34	\$80.68 \$5.12		\$48.01	\$32,853.59	\$53.92	\$36,896.73	Collocation Compliance Run
Cage- 201- 300 Sq. Ft	\$80.92	\$55,380.28	\$89.79		\$49.36	\$33,781.97	\$55.68	\$38,101.26	Collocation Compliance Run
Cage- 301- 400 Sq. Ft	\$83.71	\$57,287.56	\$5.69 \$97.18 \$6.16		\$51.06	\$34,945.41	\$57.91	\$39,632.90	Collocation Compliance Run
Adjustment for 20A Initial Power Feed	(\$12.39)	(\$8,481.43)	\$0.10		(\$7.56)	(\$5,173.67)	(\$7.31)	(\$5,001.04)	Collocation Compliance Run
Adjustment for 30A Initial Power Feed	(\$11.28)	(\$7,721.61)			(\$6.88)	(\$4,710.18)	(\$6.51)		Collocation Compliance Run
Adjustment for 40A Initial Power Feed Adjustment for 100A Initial Power Feed	(\$8.96) \$13.72	(\$6,133.10) \$9,389.08			(\$5.47) \$8.37	(\$3,741.19) \$5,727.34	(\$4.89) \$8.27	(\$3,343.46) \$5,660.90	Collocation Compliance Run Collocation Compliance Run
Adjustment for 200A Initial Power Feed	\$43.80	\$29,974.50			\$26.72	\$18,284.45	\$25.43	\$17,401.79	Collocation Compliance Run
Adjustment for 300A Initial Power Feed	\$80.36	\$54,995.90			\$49.02	\$33,547.50	\$45.38	\$31,052.81	Collocation Compliance Run
Adjustment for 400A Initial Power Feed Each Additional 20A Power Feed	\$123.60 \$10.24	\$84,587.92 \$7,004.36			\$75.40 \$6.25	\$51,598.63 \$4,272.66	\$69.36 \$5.75	\$47,464.46 \$3,937.57	Collocation Compliance Run Collocation Compliance Run
Each Additional 30A Power Feed	\$11.35	\$7,764.18	[[ľ	\$6.92	\$4,736.15	\$6.55	\$4,484.26	Collocation Compliance Run
Each Additional 40A Power Feed	\$13.67	\$9,352.68			\$8.34	\$5,705.13	\$8.18	\$5,595.15	Collocation Compliance Run
Each Additional 60A Power Feed Each Additional 100A Power Feed	\$22.63 \$36.35	\$15,485.78 \$24,874.87	1		\$13.80 \$22.17	\$9,446.33 \$15,173.67	\$13.06 \$21.33	\$8,938.61 \$14,599.51	Collocation Compliance Run Collocation Compliance Run
Each Additional 200A Power Feed	\$66.43	\$45,460.29]			\$27,730.78	\$38.49		Collocation Compliance Run
Each Additional 300A Power Feed	\$102.99	\$70,481.68				\$42,993.82	\$58.44		Collocation Compliance Run
Each Additional 400A Power Feed	\$146.23	\$100,073.71			\$89.20	\$61,044.96	\$82.42	\$56,403.07	Collocation Compliance Run
Floor Space Lease, per Square Foot	\$3.69			\$2.87	\$2.25		\$3.56	•	Collocation Compliance Run
Grounding 2/0 AWG - per Foot	\$0.0185	\$12,65	\$0.0171	\$11.29	\$0.01129	\$7.72	\$0.00915	\$6.26	Collocation Compliance Run
1/0 AWG - per Foot	\$0.0165	\$12,05	\$0.0171	\$11.29 \$18.79	\$0.01129	\$12.84	\$0.00915		Collocation Compliance Run Collocation Compliance Run
4/0 AWG - per Foot	\$0.0349	\$23.92	\$0.0324	\$21.35	\$0.02129	\$14.59	\$0.02032	\$13.91	Collocation Compliance Run
350 kcmil - per Foot 500 kcmil - per Foot	\$0.0485 \$0.0540	\$33.18 \$36.97	\$0.0449 \$0.0501	\$29.62 \$33.01	\$0.02959 \$0.03294	\$20.24 \$22.55	\$0.03001 \$0.03339	\$20.54 \$22.85	Collocation Compliance Run Collocation Compliance Run
750 kcmii – per Foot	\$0.0828	\$56.65	\$0.0767	\$50.57	\$0.05051	\$34.56	\$0.05169	\$35.37	Collocation Compliance Run
CLEC-to-CLEC Connections									
CLEC to CLEC Quote Preparation Fee									j
Design Engineering & Installation – No Cables		\$791.63		\$641.89		\$482.89		\$791.63	ALJ Recommended
Cable Racking (Per Foot) DS0	\$0.17261		\$0.15324		\$0.10529		\$0,13321		Collocation Compliance Run
DS1	\$0.18290	[\$0.16211	ĺ	\$0.11157	[]	\$0.13321 \$0.14273		Collocation Compliance Run Collocation Compliance Run
DS3	\$0.15906		\$0.14155	. [\$0.09703		\$0.12067		Collocation Compliance Run
Virtual Connections (Connections only; No Cables)									
DS0 (Per 100 Connections)		\$224.01		\$199.97		\$136.65		\$174.13	Collocation Compliance Run
DS1 (Per 28 Connections)		\$102.17 \$8.84		\$91.21 \$7.80		\$62.32 \$5.30		\$83.13	Collocation Compliance Run
DS3 (Per 1 Connection)				\$7.89		\$5.39		\$4.59	Collocation Compliance Run
Cable Hole (if Applicable)		\$442.49		\$381.95		\$269.92		\$437.77	Collocation Compliance Run
CLEC to CLEC Cross-Connection		\$256.37				\$156.39		\$244.82	ALJ Recommended
UNBUNDLED NETWORK ELEMENTS (UNES)									
Interconnection Tie Pairs (ITP)-Per Termination DS0 2-wire	\$0.48]	\$0.00	\$0.00	\$0.29		\$0.46		Collocation Compliance Run
DS0 4-wire	\$0.48		\$0.00	\$0.00	\$0.29		\$0.46		Collocation Compliance Run
DS1 Per each Termination DS3 Per each Termination	\$1.52 \$15.33		\$0.00 \$0.00	\$0.00 \$0.00	\$0.93 \$9.35		\$1.49		Collocation Compliance Run
Cop r er each reminiandfi	\$15.55		1 40.00	φυ.υυ <u> </u>	QS.QD	11	\$15.25		Collocation Compliance Run Exhibit G - Owest Exceptions

EXHIBIT G

QWEST ACC Staff ALJ Recommended Joint AT&T/Worldcom/XO **Pricing Proposal Pricing Proposal** Pricing Proposal ROO Decision NRC NRC NRC NRC Recurring Recurring Recurring Recurring INTERCONNECTION Unbundled Loops \$25.95 \$12.35 Al Compliance Run \$10.10 \$14.55 2 Wire Voice Grade Zone 1 \$16.89 \$7.34 \$11.23 \$9.93 \$14.60 \$11.23 \$15.70 HAI Compliance Run - AT&T Zone Optimizer HAI Compliance Run - AT&T Zone Optimizer \$22.57 Zone 2 \$34.34 \$32 AB \$35.41 \$42.44 HAI Compliance Run - AT&T Zone Optimizer \$24.07 Not addressed in Order \$51.87 \$13.13 4 Wire Voice Grade Zone 1 \$33.76 \$9.54 \$19.25 Not addressed in Order \$45.12 \$14.60 Not addressed in Order Zone 2 \$68.66 \$41.68 \$70.13 Not addressed in Order Non-loaded Loops \$25.95 \$14.55 HAI Compliance Run 2 Wire Non-loaded Loop Zone 1 \$16.89 \$7.34 \$9.93 \$11.23 HAI Compliance Run \$22.57 HAI Compliance Run \$14.60 Zone 2 \$11.23 \$15.70 \$34.34 \$32.06 \$35.41 HA! Compliance Run \$51.87 4 Wire Non-loaded Loop \$33.76 \$9.54 \$19.25 ddressed in Order Zone 2 \$45.12 \$14.60 \$28.55 Not addressed in Order \$41.68 \$70.13 Not addressed in Order \$1.59 Unbundled Loop Grooming (2 Wire) west Compliance Run - 10% Grooming Unbundled Loop Grooming (4 Wire) \$3.64 \$0.85 Owest Compliance Run - 10% Grooming \$652.83 Cable Unloading/Bridge Tap Removal \$0.00 Under 18,000 feet, per loop \$40.00 \$40.00 LJ Recommended Above 18,000 feet, per location (for serial and buried) \$70.00 \$70.00 AL J Recommended Above 18,000 feet, per location (for underground) \$400.00 \$2.00 ALJ Recommended Above 18,000 feet, each additional coil or tap at \$2.00 Basic Rate ISDN /XDSL/ADSL Capable Loops Zone 1 Zone 2 \$18.89 \$7.34 \$9.93 \$11.23 HAI Compliance Run - AT&T Zone Optimizer \$11.23 \$15.70 HAI Compliance Run - AT&T Zone Optimizer Zone 3 \$34.34 \$32.06 \$35.41 \$42 44 HAI Compliance Run - AT&T Zone Optimizer DS1 Capable Loop \$86.70 \$43.35 Not addressed in Order \$84.48 ** \$42.37 Not addressed in Order Zone 1 Zоле 2 \$84.57 \$42 62 Not addressed in Order ** \$91,39 Zone 3 \$47.07 Not addressed in Order DS3 Capable Loop \$947.85 \$516.73 Not addressed in Order ** \$897.72 \$479.23 Zone 1 Not addressed in Order Zone 2 \$800 73 \$490.19 Not addressed in Order \$1,053.66 \$648.11 Not addressed in Order \$2.52 2 Wire Extension Technology \$0.00 Not addressed in Order 2-Wire Extension Technology - Unbundled Loop Grooming \$1.60 Not addressed in Order DS0 - Loop Installation Charges Basic Installation Residence 2-wire \$88.29 ** \$88.29 Business - 2 wire POTS/ISDN BRI Migration (UNE Loop) \$1.76 \$1.76 AT&T NRC Compliance Run \$1,70 POTS/ISDN BRI Installation (UNE Loop) \$1.70 AT&T NRC Compliance Run ** AT&T NRC Compliance Run POTS/ISDN BRI Disconnect (UNE Loop) Residence 4-wire \$88.29 Business 4-wire ** \$18.42 AT&T NRC Compliance Run 4 Wire Migration (UNE Loop) \$18.42 \$9.83 \$7.85 4 Wire Install (UNE Loop) ** AT&T NRC Compliance Run AT&T NRC Compliance Run 4 Wire Disconnect (UNE Loop) \$7.85 \$76.07 Each Additional Loop Basic Installation with Performance Testing First Loop \$192.29 \$117.30 Not addressed in Order Each Additional Loop \$84.16 Not addressed in Order Coordinated Installation with Cooperative Testing First Loop \$232.25 \$141.67 Not addressed in Order Each Additional Loop \$137.97 \$84.16 Not addressed in Order Coordinated Installation without Cooperative Testing First Loop \$95.38 \$58.18 Not addressed in Order Each Additional Analog Loop \$83.16 \$50.73 Not addressed in Order Basic Installation with Cooperative Testing \$192.29 \$117.30 Not addressed in Order First Loop Not addressed in Order Each Additional Loop \$137.97 \$84.16 DS1 Loop Installation Charges Basic Installation \$23.40 First Loop AT&T NRC Compliance Run Each Additional Loop \$110.79 \$67.58 Migration AT&T NRC Compliance Run \$18.25 AT&T NRC Compliance Run Basic Installation with Performance Testing First Loop \$278.18 \$169.69 Not addressed in Order Not addressed in Order Each Additional Loop \$203.72 \$124.27 Coordinated Installation with Cooperative Testing \$318.14 \$194.07 Not addressed in Order First Loop Not addressed in Order Each Additional Analog Loop \$203.72 \$124.27 Coordinated Installation without Cooperative Test \$153.26 \$93.49 First Loop vot addressed in Order Each Additional Loop \$119.90 \$73.14

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

QWEST ACC Staff ALJ Recommended Joint AT&T/Worldcom/XO Pricing Proposal Pricing Proposal Pricing Proposal ROO Decision Recurring NRC NRC NRC Recurring NRC Recurring Recurring INTERCONNECTION Basic Installation with Cooperative Testing \$278.18 \$180 BC Not addressed in Order \$124.27 Fach Additional Loop \$203.72 Not addressed in Order DS3 Loop Installation Charges Basic Installation \$144.15 \$17.89 \$87.03 AT&T NRC Compliance Run Each Additional Loop \$110.79 \$67.58 \$30.79 AT&T NRC Compliance Run Migration •• AT&T NRC Compliance Run \$10.06 Disconnect Basic Installation with Performance Testing or w/cooperative testing First Loop \$278.18 \$180 60 Not addressed in Order \$124.27 Fach Additional Loop \$203.72 Not addressed in Order Coordinated Installation with Cooperative Testing First Loop \$318.14 \$194.07 Not addressed in Order Each Additional Analog Loop \$203.72 \$124.27 Not addressed in Order Coordinated Installation without Cooperative Testin \$153.26 \$93.49 Not addressed in Order First Loop Each Additional Loop \$119.90 \$73,14 Not addressed in Order Basic Installation with Cooperative Testing \$169.69 First Loop \$278.18 Not addressed in Order Each Additional Loop \$203.72 \$124.27 Not addressed in Order Subloop 2-Wire Non Loaded Distribution Loop 2-Wire Analog Distribution Loop \$21.24 \$121.43 \$8.18 HAI Compliance Run \$3.31 \$5.24 Al Compliance Run Zone 1 Zone 2 \$17.33 \$6 64 \$9.37 \$9.42 HAI Compliance Run \$25.79 \$21.40 Al Compliance Run Zone 3 \$55.50 Fach Additional 2 Wire Migration at the FDI ** AT&T NRC Compliance Run 2 Wire Disconnect at the FDI \$20.07 \$20.07 AT&T NRC Compliance Run 4-Wire Non Loaded Distribution Loop 4-Wire Analog Distribution Loop \$4.30 \$10.48 Not addressed in Order Zone 1 Zone 2 \$8.63 \$18.74 Not addressed in Order \$27.82 \$51.59 Not addressed in Order Zone 3 AT&T NRC Compliance Run AT&T NRC Compliance Run 4 Wire Migration at the FDI \$56.77 \$56.77 \$34.77 •• 4 Wire Disconnect at the FDI 2-Wire Loop Feeder \$1.41 HAI Compliance Run HAI Compliance Run - AT&T Zone Optimizer HAI Compliance Run - AT&T Zone Optimizer \$0.80 \$1.04 \$0.97 \$1.15 \$1.41 \$1.40 Zone 2 Zone 3 \$4.16 \$3.86 \$5.69 HAI Compliance Run - AT&T Zone Optimizer 4-Wire Loop Feeder \$1.04 \$2.08 \$1.94 HAI Compliance Run - AT&T Zone Optimizer Zone 1 \$1.50 \$2.82 \$2,79 HAI Compliance Run - AT&T Zone Optimizer Zone 2 \$5.41 \$7.73 \$11.38 HAI Compliance Run - AT&T Zone Optimizer 2-Wire Loop Concentration \$4.39 \$2.78 \$3.04 HAI Compliance Run - AT&T Zone Optimizer Zone 1 \$4.07 Zone 2 \$2.98 \$3.17 \$4.30 HAI Compliance Run - AT&T Zone Optimizer HAI Compliance Run - AT&T Zone Optimizer \$5.06 \$7.82 Zone 3 \$6.04 4-Wire Loop Conce \$3.61 \$6.07 Zone 1 Not addressed in Order \$3.87 \$6.35 \$7.85 \$10.13 Zone 3 Not addressed in Order Building Cable Intrabuiliding Cable Loop, Per Pair \$1.19 \$0.73 \$0.2955 On Premises Wire \$74.83 \$293.36 DS1 Each Additional Capable Feeder Loop \$219.50 \$72.62 Zone 2 \$72.71 Not addressed in Order Not addressed in Order \$17.81 Channelized DS1 Virtual Feeder to RT install \$17.81 AT&T NRC Compliance Run Channelized DS1 Virtual Feeder to RT Disconnect ** \$13.88 AT&T NRC Compliance Run oss ** FDI Field Connection Point **Field Connection Point** \$1,638.81 \$0.00 Feasibility Fee/Quote Preparation Fee lot addressed in Order Construction Fee \$0.00 Not addressed in Order Line Sharing \$37.71 Shared Loop, per Loop \$5.00 20% of Average Loop OSS - Per Line - Per Month \$2.68 \$0.10 \$0.10 AL J. Recommended Splitter Shelf Charge 537.89 \$476.91 \$328.11 \$5.17 \$476.91 Collocation Compliance Run POTS Splitter Options Splitter in the Common Area Data to 410 Block \$5.82 \$3 189 86 \$5.25 \$2 847 60 \$1,945,81 Not addressed in Order Data Direct to CLEC \$2,042.15 Not addressed in Order Splitter on the IDF Data to 410 Block \$1,015.26 \$619.31 Not addressed in Order Data Direct to CLEC \$3.47 \$1,900.90 \$3.13 \$1,696,93 \$2.12 \$1,159.55 Not addressed in Order Splitter on the MDF \$1.044.37 \$923.31 \$637.07 Data to 410 Block \$1.91 \$1.72 \$1.17 Not addressed in Order \$2,242.86 \$2,002.20 \$1,368.14 Not addressed in Order \$1,280.21 \$571.42 \$571.42 location Compliance Run New Bay \$560.00 \$120.00 Network Interface Device (NID) \$1.39 \$68.79 \$38.68 HAI Compliance Run/AT&T NRC Compliance Run

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

OWEST Joint ATAT/Worldo m/XO ACC Staff ALJ Recommended Pricing Proposal Pricing Proposal Pricing Proposal **ROO Decision** NRC NRC NRC NRC Recurring Recurring Recurring Recurring INTERCONNECTION \$0.44 \$0.62 \$0.56 HAI Compliance Run - AT&T Zone Optimizer HAI Compliance Run - AT&T Zone Optimizer Zone 2 \$0.47 \$0.68 \$0.61 HAI Compliance Run - AT&T Zone Ontimizer Unbundled Dedicated Interoffice Transport (UDIT) \$307.95 .. Not addressed in Order DS0 UDIT DS0 Over 0 to 8 Miles - Fixed \$19.27 \$12.40 \$49.74 HAI Compliance Run \$0.13 \$0.06 Al Compliance Run \$0.00 DS0 Over 0 to 8 Miles - per mile DS0 Over 8 to 25 Miles - Fixed \$10.20 \$12.41 \$40 74 HAI Compliance Pun \$0.12 \$0.06 \$0.00 IAI Compliance Run DS0 Over 8 to 25 Miles - per mile DS0 Over 25 to 50 Miles - Fixed \$19.33 \$12.43 \$49.74 HAI Compliance Run \$0.12 \$0.05 \$0.00 HAI Compliance Run DS0 Over 25 to 50 Miles - per mile DS0 Over 50 Miles - Fixed \$10.28 \$12.41 \$40.74 HA! Compliance Run OS0 Over 50 Miles - per mile \$0.06 \$0.00 IAI Compliance Run \$0.03 \$7.60 AT&T NRC Compliance Run HAI Compliance Run DS1 UDIT \$352.92 \$7 60 •• DS1 Over 0 to 8 Miles - Fixed \$31.14 DS1 Over 0 to 8 Miles - per mile \$1.45 \$0.86 \$0.00 HAI Compliance Pun \$31.40 \$21.38 \$143.54 DS1 Over 8 to 25 Miles - Fixed IAI Compliance Run DS1 Over 8 to 25 Miles - per mile \$1.18 \$0.70 \$0.00 HAI Compliance Run \$31.87 \$21.66 ** \$143.54 IAI Compliance Run DS1 Over 25 to 50 Miles - Fixed DS1 Over 25 to 50 Miles - per mile \$2.14 \$1 27 \$0.00 HAI Compliance Run •• \$31.83 \$143.54 HAI Compliance Run \$21.64 DS1 Over 50 Miles - Fixed DS1 Over 50 Miles - per mile \$1.12 \$0.67 \$0.00 IAI Compliance Run .. \$0.53 \$0.53 AT&T NRC Compliance Run DS1 Interoffice Transport - Disconnect DS3 UDIT \$352,92 \$7.60 \$7.60 AT&T NRC Compliance Run HAI Compliance Run DS3 Over 0 to 8 Miles - Fixed \$197.32 \$142.72 \$1,700.22 \$61.17 \$200.35 \$0.00 \$1,700.22 DS3 Over 0 to 8 Miles - per mile \$42.03 HAI Compliance Bug \$142.69 DS3 Over 8 to 25 Miles - Fixed Al Compliance Run IAI Compliance Run DS3 Over 8 to 25 Miles - per mile \$18.78 \$13.70 \$0.00 AAI Compliance Run DS3 Over 25 to 50 Miles - Fixed \$184.41 \$133.59 \$1,700.22 DS3 Over 25 to 50 Miles - per mile \$23.73 \$18.22 SO DO HAI Compliance Run .. \$194.79 \$140.93 \$1,700.22 IAI Compliance Run DS3 Over 50 Miles - Fixed DS3 Over 50 Miles - per mile HAI Compliance Run \$16.34 \$11.00 \$0.00 •• \$0.53 AT&T NRC Compliance Run DS3 Interoffice Transport - Disconnect OG3 UDIT \$352.92 Not addressed in Order OC-3 Over 0 to 8 Miles - Fixed \$655.37 \$582.00 ** Not addressed in Order OC-3 Over 0 to 8 Miles - per mile \$205.64 \$170.97 Not addressed in Order ** OC-3 Over 8 to 25 Miles - Fixed \$660.44 Not addressed in Order OC-3 Over 8 to 25 Miles - per mile \$66.12 \$47 12 Not addressed in Order ** \$563.07 OC-3 Over 25 to 50 Miles - Fixed \$633.02 Not addressed in Order OC-3 Over 25 to 50 Miles - per mile \$86.07 \$61.62 Not addressed in Order ** \$650.60 \$577.92 OC-3 Over 50 Miles - Fixed Not addressed in Order OC-3 Over 50 Miles - per mile \$60.95 \$36.76 Not addressed in Order .. \$352.92 OC-12 UDIT Not addressed in Order OC-12 Over 6 to 8 Miles - Fived \$1 837 87 \$1,665,13 Not addressed in Order ** OC-12 Over 0 to 8 Miles - per mile \$54.45 Not addressed in Order OC-12 Over 8 to 25 Miles - Fixed \$1 837 87 \$1,665,13 Not addressed in Order ** OC-12 Over 8 to 25 Miles - per mile \$56.69 Not addressed in Order OC-12 Over 25 to 50 Miles - Fixed \$1.837.87 \$1 885 13 Not addressed in Order ** OC-12 Over 25 to 50 Miles - per mile \$106.76 \$61.35 Not addressed in Order OC-12 Over 50 Miles - Fixed \$1 837 87 \$1 665 13 Not addressed in Order •• lot addressed in Order OC-12 Over 50 Miles - per mile \$122.10 \$72.38 ** Above OC-12 UDIT Extended Unbundled Dedicated Interoffice Transport DS1 E-UDIT \$55.78 \$411.42 \$0.00 \$0.00 \$0.00 Included in UDIT \$411.42 \$411.42 DS3 E-HDIT \$317.26 \$0.00 \$0.00 \$0.00 Included in UDIT \$0.00 \$0.00 •• \$692.68 OC-3 E-UDIT \$0.00 Included in UDIT •• OC-12 E-UDIT \$1,301.75 \$411.42 \$0.00 \$0.00 \$0.00 Included in UDIT •• •• Above OC-12 E-UDIT \$0.00 \$0.00 Included in UDIT •• DS0 UDIT Low Side Channelization Low Side Channel Performance \$11.52 Not addressed in Order Low Side Channel Performance with Multiplexing \$7.35 Not addressed in Order DS1/DS0 Low Side Channelization Not addressed in Order ٠. Multiplexing DS3 to DS1 \$232.15 \$141.61 Not addressed in Order Multiplexing DS1 to DS0 \$210.68 \$128.51 Not addressed in Order UDIT M1-3 Multiplexing \$2 569 47 •• UDIT MI-O Multiplexing High Side \$273.68 Not addressed in Order UDIT M1-0 Multiplexing Low Side \$7.35 \$239.83 Not addressed in Order UDIT Rearrangement \$176.26 Single Office Not addressed in Order Dual Office \$219.07 •• Not addressed in Order High Capacity Single Office \$238,39 Not addressed in Order High Capacity Dual Office \$266.02 ** Not addressed in Order Unbundled Dark Fiber (UDF) ** Single Strand Increments (Available May 31, 2001) Initial Records Inquiry (IRI) \$159,49 Simple Not addressed in Order Complex \$203.37 ** Mid-Point Structure Inquiry (MPSI) ** Field Verification and Quote Preparation (FVQP) \$1,485.33 \$0.00 Field Verification \$0.00 Order Charge per PR/Route/Order \$563.63 Not addressed in Order Order Charge ea Addl. Pr/Same Route \$271.89 lot addressed in Order Termination, Fixed per Pr./Office Termination-Wire Center-2 Per Paid \$6.77 ** Fiber Transport, per Mile \$83.07 Fiber Cross-Connect Per Pr \$4.03 \$21.56 \$8.64 AT&T NRC Compliance Run Fiber Disconnect \$9.44 AT&T NRC Compliance Run

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

Joint AT&T/Worldcom/XO

ALJ Recommended

QWEST ACC Staff Pricing Proposal Pricing Proposal **Pricing Proposal** ROO Decision NRC NRC Recurring NRC Recurring Recurring Recurring NRC INTERCONNECTION UDF-Loop Charges \$563 63 Not addressed in Order Order Charge per Pr./Route/Orde \$271.89 Not addressed in Order Order Charge ea Addi Pr/Same Route Termination, Fixed Per Pr./Office \$7.01 ** \$6.42 Termination Fixed Per Pt./Prem Fiber Transport, per Route/Per Pi \$110.86 UDF Loop - Per Fiber Loop Fiber Cross-Connect Per Pr. \$21.56 \$8.64 \$8 B4 AT&T NRC Compliance Run ** \$9.44 \$9.44 AT&T NRC Compliance Run Fiber Disconnect Extended Unbundled Dark Fiber (E-UDF) Order Charge per Pr./Route/Order \$563.63 Not addressed in Order \$271.89 Not addressed in Order Order Charge ea Addi. Pr.Same Route \$7.0 Not addressed in Order Termination at Wire Center, 2 per Pair Termination Fixed Per Pr./Prem \$6.42 Fiber Transport, per Route/Per Pr \$110.86 Not addressed in Order E-UDF Fiber (Per pair) .. \$21.56 Fiber Cross-Connect Per Pr \$4.03 Not addressed in Order Shared Transport \$0.001519 \$0.000074 Next Phase Per Minute of Use - TELRIC Based Rate Local Tandem Switching \$56.98 \$220.95 \$17.81 DS1 Local Message Trunk Port \$0.00 \$17.81 AT&T NRC Compliance Run DS1 Local Message Trunk Port - Disconnect AT&T NRC Compliance Run \$211.06 Trunk Group - First Trunk ** Message Trunk Group – Each Additional Trunk DS1 Trunk Group-Each Additional Trunk-Per Order \$24.49 Per minute of use \$0.002376 \$0.00052 \$0.00057 Local Switching Local Switching - TELRIC Based Rates Analog Line Side Port, First Port \$145.57 \$0.90 \$1.68 \$1.12 \$1.68 AT&T NRC Compliance Run Analog Line Side Port, Each Additional \$1.28 \$95.75 ** Analog Line Side Port, Disconnect \$1.57 \$1.57 AT&T NRC Compliance Run \$0.002599 \$0.00121 \$0.00149 Next Phase Local Usage, per Minute of Use Line Port (DS0, Analog, ISLU) Disconnect 10XXX Direct Dialed Blocking \$0.08 \$0.00 \$0.00 \$80.01 \$0.00 ** Not addressed in Order \$0.00 Account Codes - per system Attendant Access Line - per station line \$0.08 \$1.16 \$1.01 \$0.00 \$0.00 Not addressed in Order ** ** \$0.00 \$0.00 Not addressed in Order Audible Message Waiting Authorization Codes - per system \$3 13 \$239.29 \$0.00 \$0.00 Not addressed in Order ** \$0.00 \$0.00 ** Auto Call Back Automatic Line \$0.07 \$0.34 \$0.00 \$0.00 Not addressed in Order ** \$2,099.56 ** \$2.12 \$0.00 \$0.00 Automatic route selection - Common Equip per sys Not addressed in Order Blocking of pay per call services \$0.10 \$0.00 \$0.00 \$0.00 \$0.00 ** ** \$0.08 Bridging Call Drop \$0.07 \$0.34 \$0.00 \$0.00 Not addressed in Order ** ** \$0.07 \$0.00 Call Exclusion - Automatic \$1.01 \$0.00 Not addressed in Order Call Exclusion - Manual \$0.07 \$0.67 \$0.00 \$0.00 Not addressed in Order \$0.00 ** ** Call Forward Don't Answer - All Calls \$0.13 \$0.00 Call Forwarding Incoming Only \$0.08 \$0.00 \$0.00 ** ** \$0.00 \$0.00 \$0.08 Call Forwarding Intra Group Only ** Call Forwarding Variable Remote \$0.11 \$0.00 \$0.00 ** ** ** ** ** ** ** ** ** \$0.00 Call Forwarding Busy Line \$0.00 Call Forwarding: Busy Line (Expanded) ¢n na \$0.00 \$0.00 ** \$0.09 \$0.00 \$0.00 Call Forwarding: Busy Line (External) Call Forwarding: Busy Line (External) Don't Answer \$0.15 \$0.00 \$0.00 ** \$0.09 \$0.00 Call Forwarding: Busy Line (Overflow) \$0.00 Call Forwarding: Busy Line (Overflow) Don't Ans En 15 \$0.00 \$0.00 .. \$0.10 \$0.00 Call Forwarding: Busy Line (Programmable) \$0.00 CF Busy Line Don't Answer Programmable - Svc Establishe ** \$15.66 \$0.00 \$0.00 Not addressed in Order ** CF Busy Line Don't Answer Programmable - per line \$1.01 \$0.00 \$0.00 Not addressed in Order Call Forwarding: Busy Line Don't Answer (Expande \$0.15 \$37.92 \$0.00 \$0.00 ** Not addressed in Order ** \$0.13 \$37.92 Call Forwarding: Don't Answer \$0.00 \$0.00 Not addressed in Order Call Forwarding: Don't Answer (Expanded) ** \$0.13 \$0.00 \$0.00 ** \$0.13 Call Forwarding: Don't Answer (Programable) \$0.00 \$0.00 Call Forwarding: Variable ** \$0.10 \$0.00 \$0.00 ** \$0.10 Call Forwarding: Variable no call complete option \$0.00 \$0.00 \$0.08 \$0.00 \$0.00 ** ** ** ** ** Call Hold/3-Way/Call Transfer \$0.32 \$0.00 \$0.00 \$0.00 \$0.09 \$0.00 ** Call Park (Basic - Store & Retrieve) Call Pickup \$0.08 \$0.00 \$0.00 ** ** ** ** ** ** ** \$0.32 Call Waiting Dial Originating \$0.08 \$0.00 \$0.00 ** \$0.00 Call Waiting Indication - per timing state \$0.46 \$1.01 Not addressed in Order Call Walting Originating \$0.09 \$0.00 \$0.00 ** Call Waiting Terminating - All Calls ** Call Waiting Terminating - Incoming Only \$0.11 \$0.00 \$0.00 \$0.00 ** Call Waiting/Cancel Call Waiting \$0.14 \$0.00 \$1,206,23 **CENTREX Common Equipment** \$0.00 \$0.00 Not addressed in Order CENTREX Management System (CMS) \$0.60 ** CENTREX Plus DID Numbers per number \$0.11 \$0.00 \$0.00 ** CENTREX Plus to CENTREX Plus \$5.28 \$0.00 \$0.00 ** \$5.28 CENTREX Plus to IC Carrier \$0.00 \$0.00 CENTREX Plus to PBX/Key Blocked \$0.00 \$0.00 ** CENTREX Plus to PBX/Key Non-Blocked \$5.28 \$0.00 \$0.00 CFBL - All Calls \$0.09 \$0.00 \$0.00 ** CBL - Incoming Only \$0.09 \$37.92 \$0.00 \$0.00 Not addressed in Order CFDA Incoming Only \$37.92 \$0.00 ** Not addressed in Order CLASS - Anonymous Call Rejection \$0.33 \$0.00 \$0.00 CLASS - Call Waiting ID \$0.10 \$0.00 \$0.00 ** ** CLASS - Calling Name & Number \$0.41 \$0.00 \$0.00 CLASS - Calling Number Delivery \$0.10 ** ** CLASS - Calling Number Delivery Blocking \$0.34 \$0.00 \$0.00 CLASS - Continuous Redial lot addressed in Order

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

Joint AT&T/Worldcom/XO

OWEST

ACC Staff

ALJ Recommended

Pricing Proposal Pricing Proposal Pricing Proposal ROO Decision NRC NRC Recurring Recurring Recurring NRC Recurring NRC INTERCONNECTION \$0.00 CLASS - Last Call Return \$0.10 \$1.27 \$0.00 Not addressed in Order CLASS - Priority Calling Not addressed in Order CI ASS - Selective Call Forwarding \$0.16 \$1.26 \$0.00 \$0.00 Not addressed in Order ** \$0.23 \$0.00 Not addressed in Order CLASS - Selective Call Rejection Common Equipment per 1.544 mbps facility (DS1) \$58.01 \$0.00 \$0.00 \$42.47 ** Conference Calling - Meet Me \$0.00 Not addressed in Order Conference Calling - Preset \$10.27 \$42.47 \$0.00 \$0.00 Not addressed in Order ** Custom Ringing First Line (Short/Long/Short) \$0.09 \$0.00 \$0.00 Custom Ringing First Line (Short/Short) \$0.09 \$0.00 \$0.00 ** \$0.09 \$0.00 Custom Ringing First Line (Short/Short/Long) Custom Ringing Second Line (Short/Long/Short) \$0.09 \$0.00 \$0.00 ** Custom Ringing Second Line (Short/Short) \$0.09 \$0.00 \$0.00 Custom Ringing Second Line (Short/Short/Long) \$0.00 \$0.00 \$0.00 .. \$0.08 \$0.00 Custom Ringing Third Line (Short/Long/Short) Custom Ringing Third Line (Short/Short) \$0.08 \$0.00 \$0.00 ** \$0.08 \$0.00 \$0.00 Custom Ringing Third Line (Short/Short/Long) Data Call Protection (DMS 100) \$0.07 \$0.00 \$0.00 ** \$1.76 \$0.00 \$0.00 Not addressed in Order Dir Sta Sel/Busy Lamp Fld per arrangement Directed Call Pickup with Barge-in \$0.18 \$20.16 \$0.00 \$0.00 Not addressed in Order \$20.16 ** \$0.10 \$0.00 \$0.00 Not addressed in Order Directed Call Pickup without Barge-in Distinctive Ring/Distinctive Call Waiting \$0.09 \$40.31 \$0.00 \$0.00 Not addressed in Order ** \$0.09 \$0.00 \$0.00 Distinctive Ringing EBS - Set Interface - per station line \$1.39 \$0.00 \$0.00 .. ** \$0.00 \$0.08 \$0.00 **Executive Busy Overide** Expensive Route Warning Tone - per system \$0.07 \$71.91 \$0.00 \$0.00 Not addressed in Order \$44.24 ** \$0.07 \$0.00 \$0.00 Facility Restriction Level - per system Not addressed in Order Feature Display \$0.08 \$0.00 \$0.00 ** .. \$0.00 \$0.15 \$0.00 Group Intercom Not addressed in Order Hot Line - per line \$0.13 \$1.01 \$0.00 \$0.00 Not addressed in Order \$0.00 ** Hunting Multiposition Circular Hunting \$0.00 \$0.26 Hunting Multiposition Hunt Queuing \$0.22 \$38.59 \$0.00 \$0.00 Not addressed in Order \$0.00 .. ** **Hunting Multiposition Series Hunting** \$0.26 \$0.00 Hunting Multiposition with Announcement in Queu \$3.08 \$38.59 \$0.00 \$0.00 Not addressed in Order •• \$1.10 \$40.75 \$0.00 \$0.00 Hunting Multiposition with Music in Queue Not addressed in Order Incoming Calls Barred \$0.08 \$0.00 \$0.00 ** ** \$0.00 International direct Dial Blocking \$0.08 \$0.00 ISDN Short Hunt \$0.56 \$1.70 \$0.00 \$0.00 Not addressed in Order ** \$0.09 \$0.00 \$0.00 Line Side Answer Supervision Loudspeaker Paging - per trunk group \$21.11 \$176.53 \$0.00 \$0.00 Not addressed in Order ** ** Make Busy Arrangements - per group \$0.35 \$0.67 \$0.00 \$0.00 Not addressed in Order ** \$0.14 \$0.67 \$0.00 \$0.00 Make Busy Arrangements - per line Not addressed in Order ** Message Center - per main station line \$0.07 \$0.34 \$0.00 \$0.00 Not addressed in Order \$0.00 \$0.00 ** ** Message Walting Indication A/V ** Message Waiting Visual \$0.13 \$0.34 \$0.00 \$0.00 Not addressed in Order \$23.13 \$0.00 \$0.00 Not addressed in Order \$0.00 \$0.00 Network Speed Call \$0.08 \$0.08 \$0.00 \$0.00 Night Service Arrangement ** ** Outgoing Calls Barred \$0.08 \$0.00 \$0.00 ** \$0.13 \$0.00 \$0.00 \$0.47 Privacy Release \$0.08 \$0.00 \$0.00 Not addressed in Order \$0.24 \$0.00 \$0.00 ** Speed Calling 1 Digit Controller \$0.08 \$0.00 \$0.00 \$0.08 \$0.00 \$0.00 ** Speed Calling 1# List Individual \$0.08 \$0.00 \$0.00 \$0.08 \$0.00 \$0.00 ** Speed Calling 2 Digit Controller Speed Calling 2 Digit User \$0.08 \$0.00 \$0.00 \$0.08 \$0.00 ** Speed Calling 2# List Individua Speed Calling 30 Number \$0.08 \$0.00 \$0.00 \$0.00 \$0.00 ** Speed Calling 8 Number Speed Call Long-Customer Change \$0.00 \$0.00 ** Station Camp-On Service - per main station \$8.18 \$0.34 \$0.00 Not addressed in Order Station Dial Conferencing (6 way) \$1.84 \$0.00 \$0.00 ** Station Message Detail Recording (SMDR) \$0.00 Three Way Calling \$0.32 \$0.00 \$0.00 ** Time and Date Display Time of Day Control for ARS - per system \$0.07 \$125.82 \$0.00 \$0.00 Not addressed in Order ** ** Time of Day NCOS Update \$0.00 \$0.00 Not addressed in Order Time of Day Routing - per line \$0.13 \$0.52 \$0.00 \$0.00 Not addressed in Order ** Toli Restriction Service \$0.00 \$0.00 Trunk Answer Any Station \$0.08 \$0.00 \$0.00 Trunk Verification from Designated Station \$0.07 \$0.39 \$0.00 \$0.00 ** ** Not addressed in Order UCD in Hunt Group - per line \$7.92 \$0.67 \$0.00 \$0.00 Not addressed in Order ** UCD with Music After Delay \$0.00 \$0.00 CMS - System Establishment - Initial Installation \$971.60 \$0.00 \$0.00 Not addressed in Order ** ** CMS - System Establishment - Subsequent Installation \$0.00 \$0.00 Not addressed in Order Not addressed in Order CMS - Packet Control Capability, per System \$485.80 \$0.00 \$0.00 ** SMDR-P - Service Establishment Charge, Initial Installation \$339.30 \$0.00 \$0.00 Not addressed in Order SMDR-P Archived Data \$177.29 \$0.00 \$0.00 ** \$2.39 Class - Call Trace (per occurrence) \$0.00 \$0.00 Not addressed in Order ** \$0.28 \$0.28 AT&T NRC Compliance Run Feature Changes 13.57 Subsequent Order Charge Digital Line Side Port (Supporting BRI ISDN) AT&T NRC Compliance Run AT&T NRC Compliance Run First Port and each additional port \$10.56 219 37 \$1 RR Disconnect \$1.57 DS0 Analog Trunk Port First Port \$15.78 \$123.11 \$0.90 \$1.68 \$1.12 Not addressed in Order Fach Additional \$15.78 \$28.57 Not addressed in Order Digital Trunk Ports DS1 Local Message Trunk Port \$0.00 \$17.81 80.16 HAI Compliance Run DS1 Local Message Trunk Port - Disconnect \$13.12 Not addressed in Order ** Message Trunk Group, First Trunk Not addressed in Order ** lot addressed in Order Message Trunk Group, Each Additional DS1 PRI ISDN Trunk Port lot addressed in Order DS1 DID Trunk Port

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

QWEST ACC Staff ALJ Recommended Joint AT&T/Worldcom/XO Pricing Proposal **Pricing Proposal** Pricing Proposal ROO Decision NRC NRC Recurring NRC Recurring Recurring Recurring NRÇ INTERCONNECTION Common Channel Signaling/SS7 CCSAC STP Port \$249.69 \$440.28 lot addressed in Order CCSAC Options Activation Charge Not addressed in Order Basic Translations Not addressed in Order 115 34 First Activation, per order Not addressed in Order ** Each Additional Activation, per \$9.58 Not addressed in Order CCSAC Options Database Translations .. 134.49 First Activation per order Not addressed in Order \$57.45 0.0020272 Signal Formulation, ISUP, Per Call Set-Up Request Not addressed in Order Signal Transport, ISUP, Per Call Set-Up Request \$0.0013148 Not addressed in Order \$0.0002914 Signal Transport, TCAP, per Data Request Not addressed in Order Signal Switching, ISUP, Per Call Set-Up Request Signal Switching, TCAP, Per Data Request \$0,0009192 Not addressed in Order \$0.0005754 Not addressed in Order \$0.00005 \$0,00008 \$0.00005 STP per message HAI Compliance Run \$0.00020 \$0.00109 \$0.00020 HAI Compliance Run ** CCS Link - First Link CCS Link - Each Additional Link Signaling Link Firet Link, DSO ** \$27.45 \$22.21 \$38.28 \$28.90 \$22.21 HAI Compliance Run/AT&T NRC Compliance Run Additional Link, DS0 \$6.33 SS7 Links (DS0) Disconnect \$6.33 AT&T NRC Compliance Run \$20.94 \$5.73 SS7 Links (DS1) Install AT&T NRC Compliance Run ** SS7 Links (DS1) Disconnect \$5.73 AT&T NRC Compliance Run SS7 STP global title translations 'A Link' only Install \$27.69 AT&T NRC Compliance Run \$27.69 SS7 STP global title translations 'A Link' only Disconnect \$27.69 AT&T NRC Compliance Run SS7 STP message transfer part 'A Link' only (port) Install \$19.63 AT&T NRC Compliance Run SS7 STP message transfer part 'A Link' only (port) Disconnect \$18.82 \$18.82 AT&T NRC Compliance Run Line Information Database (LIDB) ** LIDB Storage Not addressed in Order Line Validation Administration System Access (LVAS) Not addressed in Order LIDB Line Record Initial Load Not addressed in Order Up to 20,000 Line Records Not addressed in Order ** Over 20,000 Line Records Not addressed in Order Mechanized Service Account Update, per Addition or Update Processed Not addressed in Order ** Individual Line Record Audit Not addressed in Order Account Group Audit Not addressed in Order •• Expedited Request Charge for Manual Updates Not addressed in Order LIDB Query Service, per Query Fraud Alert Notification, per Alert \$ 0.0009435 Same as 9 13.2.2 Not addressed in Order ** Not addressed in Order 8XX Database Query Service Basic Query, per Query POTS Translation \$0.02007675 Same as 9 13 2 2 Not addressed in Order Not addressed in Order Call Handling & Destination Feature \$0.0000055 Not addressed in Order ICNAM, Per Query \$ 0 00083600 Same as 9,13,2,2 Not addressed in Order Construction Charges \$0.00 \$0.00 Not addressed in Order Miscellaneous Elements Additional Engineering - Basic \$0.00 Not addressed in Order Additional Engineering - Overtime Additional Labor Installation - Overtime \$39.38 \$0.00 \$0.00 Not addressed in Order \$9.05 \$0.00 \$0.00 ** Not addressed in Order Additional Labor Installation - Premium \$18.10 \$0.00 \$0.00 Not addressed in Order ** Additional Labor Other - Basic \$27.75 \$0.00 \$0.00 Not addressed in Order Additional Labor Other - Overtime \$37.08 \$0.00 \$0.00 ot addressed in Order Additional Labor Other - Premium \$0.00 ** \$0.00 Not addressed in Order Testing and Maintenance - Basic \$29.48 \$0.00 \$0.00 Not addressed in Order ** Testing and Maintenance - Overtime \$0.00 \$0.00 \$39.38 Not addressed in Order Testing and Maintenance - Premium \$49.28 \$0.00 \$0.00 \$27.75 ** \$0.00 \$0.00 Maintenance of Service - Basic Not addressed in Order Maintenance of Service - Overtime \$37.06 \$0.00 \$0.00 Not addressed in Order ** Maintenance of Service - Premium \$46,39 \$0.00 \$0.00 Not addressed in Order Additional COOP Acceptance Testing ~ Basic \$29.48 \$0.00 \$0.00 lot addressed in Order \$0.00 ** Additional COOP Acceptance Testing - Overtime \$0.00 \$39.38 Not addressed in Order Additional COOP Acceptance Testing ~ Premium NonScheduled COOP Testing - Basic \$49.28 \$0.00 \$0.00 ** \$29.48 \$0.00 \$0.00 Not addressed in Order ** NonScheduled COOP Testing - Overtime \$39.38 \$0.00 \$0.00 Not addressed in Order ** NonScheduled COOP Testing - Premium \$0.00 \$0.00 \$49.28 Not addressed in Order NonScheduled Manual Testing - Basic \$29.48 \$0.00 \$0.00 Not addressed in Order ** NonScheduled Manual Testing - Overtime \$39.38 \$0.00 \$0.00 Not addressed in Order NonScheduled Manual Testing - Premium \$49.28 \$0.00 \$0.00 ot addressed in Order ** Cooperative Scheduled Testing - Loss \$0.00 \$0.00 \$0.08 Not addressed in Order Cooperative Scheduled Testing - C-Message Noise \$0.08 \$0.00 \$0.00 Not addressed in Order ** \$0.00 Cooperative Scheduled Testing - Balance \$0.33 \$0.00 Not addressed in Order Cooperative Scheduled Testing - Gain Slope \$0.08 \$0.00 \$0.00 Not addressed in Order ** \$0.08 \$0.00 Cooperative Scheduled Testing - C-Notched Noise \$0.00 Not addressed in Order Manual Scheduled Testing – Loss \$0.17 \$0.00 \$0.00 Not addressed in Order ** Manual Scheduled Testing - C-Message Noise \$0.00 \$0.17 \$0.00 Not addressed in Order Manual Scheduled Testing - Balance \$0.67 \$0.00 \$0.00 ** lot addressed in Order ** \$0.17 \$0.00 Manual Scheduled Testing - Gain Slope \$0.00 Not addressed in Order Manual Scheduled Testing - C-Notched Noise \$0.17 \$0.00 \$0.00 ** Not addressed in Order Additional Dispatch \$84.60 \$0.00 \$0.00 Not addressed in Order Date Change \$10.40 \$0.00 \$0.00 ** Not addressed in Order \$74.10 \$0.00 Design Change \$0.00 Not addressed in Order Expedite Charge \$0.00 \$0.00 ** Not addressed in Order Cancellation Charge \$0.00 \$0.00 Not addressed in Order Channel Regeneration DS1 Regeneration \$480.53 \$0.00 \$0.00 \$293.12 \$1.20 ot addressed in Order DS3 Regeneration \$1,817.89 \$0.00 \$0.00 \$3.71 \$1,108,91 Not addressed in Order **UNE Platform**

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

ACC Staff QWEST Joint AT&T/World ALJ Recommended **Pricing Proposal** Pricing Proposal **Pricing Proposal** ROO Decision Recurring Recurring Recurring NRC NRC Recurring NRC NRC INTERCONNECTION UNE-P POTS Mechanized First \$55.56 Not addressed in Order ** \$15.94 Not addressed in Order UNE-P POTS Mechanized, Each Additional ** UNE-P POTS Manual, First \$82.49 Not addressed in Order UNE-P POTS Manual, Each Additional Not addressed in Order UNE-P Conversion UNE-P POTS.CENTREX, PAL, PBX \$0.68 \$0.28 \$0.28 AT&T NRC Compliance Run Mechanized, First Mechanized, Each Additional \$0.14 ** AT&T NRC Compliance Run Migration Disconnect \$0.28 AT&T NRC Compliance Run UNE-P POTS, CENTREX, PAL, PBX Manual,First \$16.28 Not addressed in Order .. Manual, Each Additional \$2.71 Not addressed in Order UNE-P PBX DID ** First \$20.70 Not addressed in Order \$3.13 Not addressed in Order Each Additional UNE-PISON BRI \$15.15 \$0.28 \$0.28 AT&T NRC Compliance Run ** Each Additional \$3.13 \$0.28 \$0.28 AT&T NRC Compliance Run ** AT&T NRC Compliance Run \$0.28 \$0.28 Disconnect •• \$51.22 Not addressed in Order UNE-PISON PRI, DSS per DS1 Facility UNE-P ISON PRI, OSS Trunk ** 18.85 Not addressed in Order First \$3.13 Not addressed in Order UNE-Combination Private Line .. DS0/DS1/DS3/OCN/Integrated T-1 Existing Service 41.05 lot addressed in Order Enhanced Extended Loop (EEL) EEL Link ** \$250.19 DS0 2-Wire DS0, Each Additional \$7.34 \$9.93 \$11.23 HAI Compliance Run - AT&T Zone Optimizer Zone 1 \$11.23 \$14.60 AI Compliance Run - AT&T Zone Optimizer \$35.41 HAI Compliance Run - AT&T Zone Optimizer Zone 3 \$32.06 \$42.44 ** Each Additional \$9.54 \$19.25 ot addressed in Order Zone 2 \$14.60 \$28.55 Not addressed in Order \$70.13 \$41.68 ** \$308.19 DS1 \$43.35 \$42.37 ** Zone 1 ot addressed in Order Zone 2 \$42.62 Not addressed in Order ** ot addressed in Order Zone 3 Each Additional \$262.31 \$516.73 ** \$332.66 DS3 Zone 1 \$479.23 andressed in Order \$490.19 ** Zone 2 lot addressed in Order Zone 3 \$648.11 Not addressed in Order \$286.78 Each Additional ** EEL C EEL Transport 307.95 DS0 EEL Transport \$6.50 \$6.50 AT&T NRC Compliance Run DS0 Over 0 to 8 Miles - Fixed 19 27 \$12.40 \$49.74 HAI Compliance Run \$0.13 \$0.06 ** HAI Compliance Run DS0 Over 0 to 8 Miles - per mile \$0.00 DS0 Over 8 to 25 Miles - Fixed \$19.29 \$12.41 \$49.74 HAI Compliance Run \$0.12 DS0 Over 8 to 25 Miles - per mile \$0.06 HAI Compliance Run \$0.00 DS0 Over 25 to 50 Miles - Fixed \$19.33 \$12.43 \$49.74 HAI Compliance Run DS0 Over 25 to 50 Miles - per mil \$0.12 \$0.05 ** \$0.00 IAI Compliance Run DS0 Over 50 Miles - Fixed \$19.28 \$12.41 \$49.74 IAI Compliance Run \$0.06 IAI Compliance Run DSC Over 50 Miles - per mile \$0.03 \$0.00 Migration \$18.88 \$18.88 AT&T NRC Compliance Run •• \$5.98 \$5.98 AT&T NRC Compliance Run Disconnec \$352.92 \$6.79 AT&T NRC Compliance Run \$6.79 DS1 EEL Transport DS1 Over 0 to 8 Miles - Fixed \$31.14 \$21.22 \$143.54 HAI Compliance Run \$1.45 \$0.86 HAI Compliance Run DS1 Over 0 to 8 Miles - per mile \$0.00 DS1 Over 8 to 25 Miles - Fixed \$31.40 \$21.38 \$143.54 HAI Compliance Run \$1.18 DS1 Over 8 to 25 Miles - per mile \$0.70 HAI Compliance Run \$0.00 DS1 Over 25 to 50 Miles - Fixed \$31.87 \$21.66 \$143.54 HAI Compliance Run \$2.14 \$1.27 DS1 Over 25 to 50 Miles - per mile \$0.00 IAI Compliance Run DS1 Over 50 Miles - Fixed \$31.83 \$21.64 \$143.54 AAI Compliance Run DS1 Over 50 Miles - per mile \$1.12 \$0.67 \$0.00 HAI Compliance Run \$19.12 AT&T NRC Compliance Run \$6.56 AT&T NRC Compliance Run \$19.12 Migration Disconnect \$6.56 \$352.92 DS3 EEL Transport DS3 Over 0 to 8 Miles - Fixed \$197.32 \$142.72 \$1,700.22 HAI Compliance Run \$61.17 \$42.03 DS3 Over 0 to 8 Miles - per mile \$0.00 HAI Compliance Run DS3 Over 8 to 25 Miles - Fixed \$200.35 \$142.69 \$1,700.22 \$18.78 DS3 Over 8 to 25 Miles - per mile \$13.70 \$0.00 HAI Compliance Run \$184.41 \$23.73 DS3 Over 25 to 50 Miles - Fixed \$133.59 \$1,700.22 Al Compliance Run ** \$16.22 DS3 Over 25 to 50 Miles - per mil \$0.00 HA! Compliance Run DS3 Over 50 Miles - Fixed \$194.79 \$140.93 \$1,700.22 1Al Compliance Run \$16.34 DS3 Over 50 Miles - per mile \$11.00 \$0.00 HAI Compliance Run Multiplexing \$232.15 \$268.62 \$0.00 \$0.00 \$128.51 \$163.86 Not addressed in Order Multiplexing DS1 to DS0 Multiplexing DS3 to DS1 DS1 Transport Mux \$210.68 \$268.62 \$0.00 \$0.00 \$141.61 \$163.86 Not addressed in Order \$258.16 \$157.48 Not addressed in Order DS3 Transport Mux \$258.16 \$157.48 Not addressed in Order DS0 Channel Performance

^{*} ALJ Recommended column is preliminary price-out

EXHIBIT G

QWEST ACC Staff ALJ Recommended Joint AT&T/Worldcom/XO **Pricing Proposal Pricing Proposal Pricing Proposal** ROO Decision Recurring NRC Recurring NRC Recurring NRC Recurring NRC INTERCONNECTION 11.52 ot addressed in Order DS0 Low Side Channelization DS1/DS0 MUX, Low Side Channelization \$7.35 239.83 Not addressed in Order Unbundled Packet Switching Vert Phase 23.45 Customer Channel Customer Channel and Shared Distribution Loop \$60.14 \$127.17 Customer Channel and Unbundled Distribution Le Customer Channel and CLEC ProvidedLoop \$60,14 ** DSLAM Virtual Transport ** Unbundled Packet Switch Loop Capability Unbundled Packet Switch Interface Port ** \$227.50 \$208.02 DS3 interface DS1 interface \$135.05 \$227.50 \$20.29 Unbundled Pack Switch DSLAM Functionality ANCILLARY SERVICES Access to Poles, Ducts, Condults and Rights of Way \$322.99 \$388.25 ** Not addressed in Order Not addressed in Order Pole Inquiry Fee, per Mile Innerduct Inquiry Fee, per Mile ROW Inquiry Fee \$143.49 \$143.49 Not addressed in Order ROW Document Preparation Not addressed in Order \$35.87 \$466.34 \$0.00 \$0.00 Field Verification Fee, pr Pole Not addressed in Order \$142.86 ALJ Recommended Field Verification Fee, per Manhole Planner Verification, per Manhole \$16.00 \$286.98 \$0.00 Not addressed in Order \$0.00 Manhole Verification Inspector, per Manhole Not addressed in Order Manhole Make Ready Inspector, per Manhole \$430.47 Not addressed in Order Not addressed in Order Make-Ready Work, per Foot Innerduct Pole Attachment Fee, per Foot, per Year \$4.28 \$0.36 ** Not addressed in Order Innerduct Occupancy Fee, per Foot, per Year Not addressed in Order **Operational Support Systems** Development & Enhancements, per Order Not addressed in Order ** Ongoing Maintenance, per Order Daily Usage Record File, per Record Not addressed in Order \$0.0007460 Not addressed in Order Trouble Isolation Charge Not addressed in Order Bona Fide Request Process \$2,410.58 \$0.00 \$0.00 ot addressed in Order Processing Fee

EXHIBIT H

EXHIBIT H

Reprint of Qwest Ex. WLF-2

An analysis of the effect of MST on total cable miles created by Richard T. Emmerson and Kevin Duffy-Deno for Qwest and filed with the Minnesota PUC in Docket No. C196-1540

Two In-Town Areas in Marshall, MN

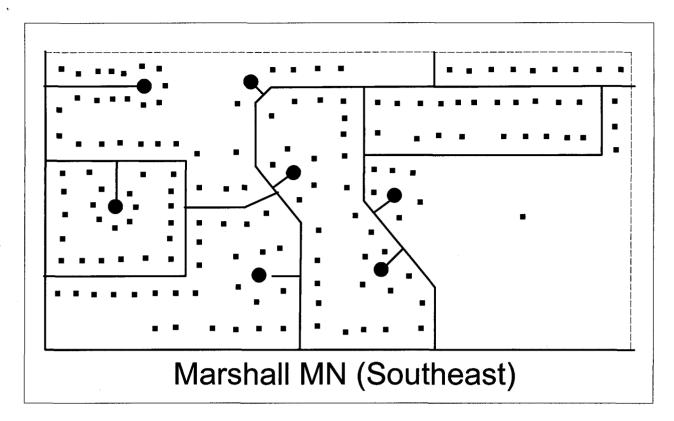
In order to get a handle on a realistic ratio between the length of a Minimum Spanning Tree and actual distribution-plus-drop cabling, we have examined two randomly chosen areas from within the town of Marshall, MN (Lyon County).

We used high resolution aerial photographs of each area and anchored each to an existing electronic map. We hand placed the individual subscriber points onto the electronic map, using the aerial photographs as source, and we determined the Minimum Spanning Tree of those subscriber points.

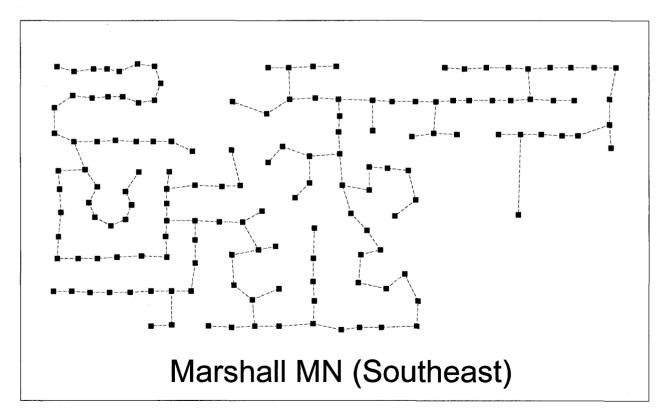
We then used another paper map of telephone easements, indicating the actual run of distribution cable, and transcribed these runs to the same electronic map. We measured the length of the distribution cable.

Because we hand placed each of the subscriber points, we knew that our freehand work would cause the drop lengths to be imprecise. Therefore, instead of measuring drop lengths from our own placement of subscribers, we used for our measurement the average drop length for the density zone as proposed by the DPS, and also the drop length proposed in the direct testimony of Bill Fitzsimmons. Because both of the areas studied have a density in the 850-2550 per square mile zone, each drop length is considered to be 90 feet (using the DPS number) or 107 feet (using Bill Fitzsimmons' number). We calculate both ways.

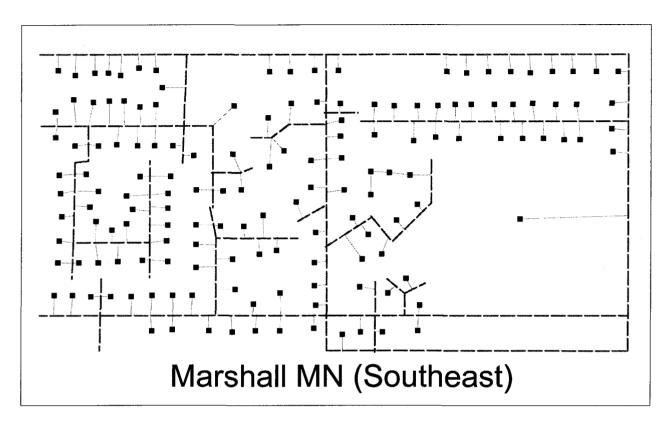
Let us first look at an area in the southeast of Marshall. It has 151 subscriber locations, for a density of 1,716 per square mile of area covered.



We determine the Minimum Spanning Tree and calculate its length as 15,706 feet.



We then lay in the distribution (heavier broken line) and drop (lighter line) cables.



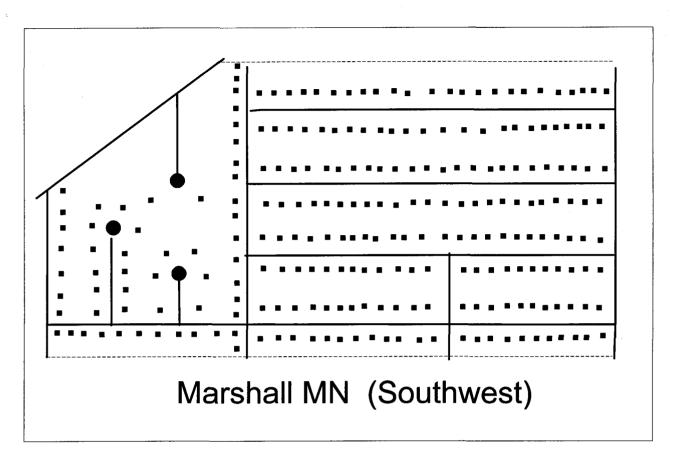
We measure the distribution cable length and find it to be 17,236 feet. Drops for 151 subscriber locations are 13,590 feet (DPS: 90×151) or 16,157 feet (Fitzsimmons: 107 \times 151).

The comparisons of cable length to Minimum Spanning Tree, then, would be as follows (the first column uses the DPS drop length, the second the Fitzsimmons drop length):

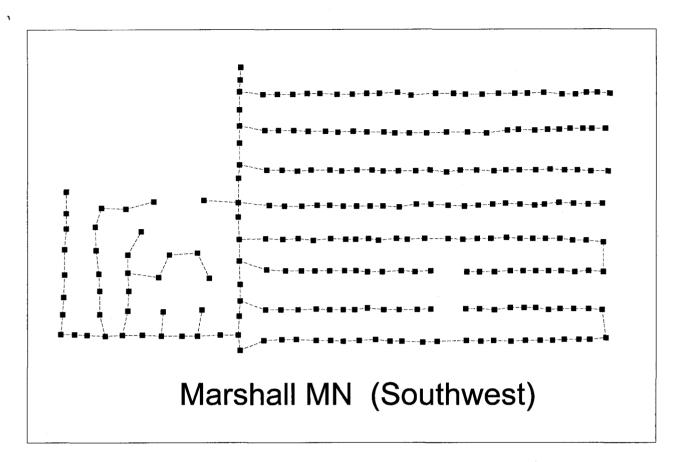
Minimum Spanning Tree	15,706 ft.	15,706 ft.
Distribution Cable Drops	17,236 ft. 13,590 ft.	17,236 ft. 16,157 ft.
Distribution plus drops	30,826 ft.	33,393 ft.
Actual-to-MST Multiplier	1.96	2.13

We should not be surprised that the multiplier approaches (or even exceeds) 2 ... in urban areas there are more man-made restrictions in the routing of cable than in rural areas.

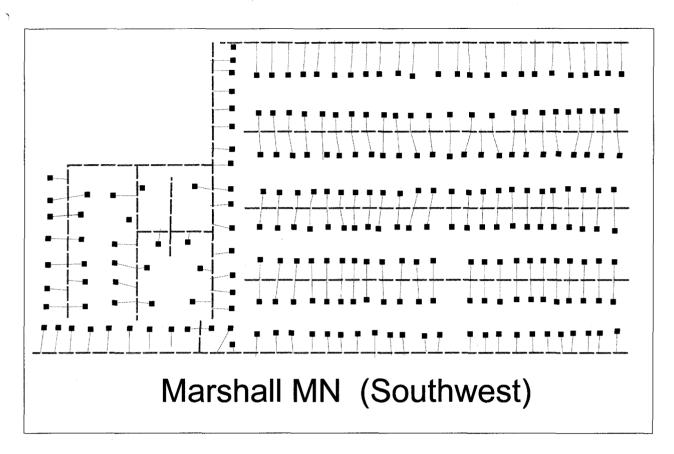
We now look at an even denser area in the southwest part of Marshall. This area has 255 subscriber points, with a density of 2,390 per square mile of area covered.



First, we determine the Minimum Spanning Tree of this set of points, and find that to be 18,114 feet.



We then lay distribution cable per map of easements, and find that distribution length to be 13,167 feet. Drops for 255 subscriber locations are 22,950 feet (DPS: 90×255) or 27,285 feet (Fitzsimmons: 107×255).



Once again we summarize the comparisons numerically (the first column uses the DPS drop length, the second the Fitzsimmons drop length):

Minimum Spanning Tree	18,114 ft.	18,114 ft.
Distribution Cable Drops	13,167 ft. 22,950 ft.	13,167 ft. 27,285 ft.
Distribution plus drops	36,117 ft.	40,452 ft.
Actual-to-MST Multiplier	1.99	2.23

Once again, a settled in-town area yields an approximately 2-times-MST actual cable length.

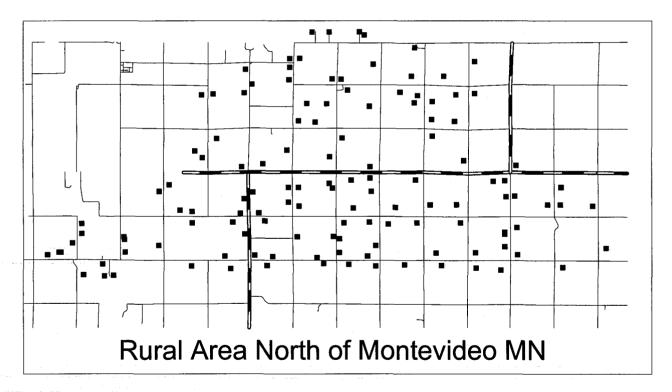
Minimum Spanning Tree and Cabling in a Rural Area

We now cite an example of a rural distribution area, specifically the area north of Montevideo, MN (Chippewa County). As with our urban examples, this area was chosen at random, the only requisite for selection being that maps were available for analysis.

The area in question is a single rural distribution area of about 52 square miles with 129 subscribers ... thus, the density is about 2.5 per square mile. The RAI is located 8 miles due north of Montevideo.

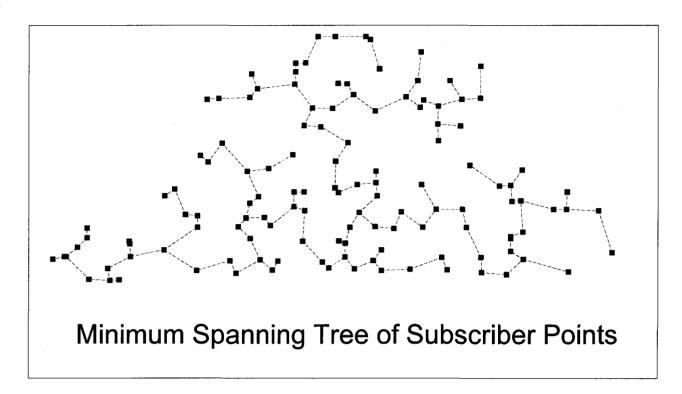
We calculate total cable length using two different measures for average drop length. For the 0-5 per square mile density zone, the DPS specifies an average drop of 250 feet. In his direct testimony, Bill Fitzsimmons specifies an average drop length of 498 feet. Inspection of the maps of this area indicate quite long drops. We calculate total cable length using both numbers.

Here is the layout of the subscribers along roads:

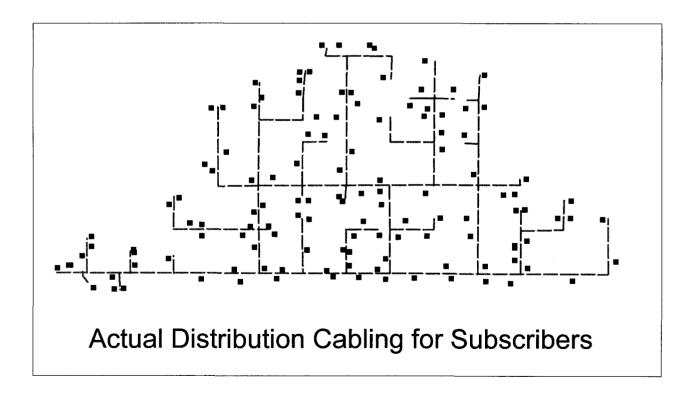


The layout of roads is typical of the township/range/section layout to be found throughout Minnesota. In this case, the area is significantly wider (about 13 miles at its widest point) than it is tall (about 6 miles), which actually reduces the dispersion of the subscriber points.

When we calculate the Minimum Spanning Tree of those 129 points, we find it to be 306,314 feet.



When we map the actual distribution cable for this area (which, we would point out, is laid out in a near-optimum fashion), we find that the length of the distribution cable is 325,718 feet ... as we would have expected, the distribution cable alone – in a rural area – is longer than the Minimum Spanning Tree.



The drops add 32,250 feet (DPS: 250×129) or 64,242 feet (Fitzsimmons: 498×129). We summarize the numbers below (the first column uses the DPS drop length, the second the Fitzsimmons drop length):

Minimum Spanning Tree	306,314 ft.	306,314 ft.
Distribution Cable Drops	325,718 ft. 32,250 ft.	325,718 ft. 64,242 ft.
Distribution plus drops	357,968 ft.	389,960 ft.
Actual-to-MST Multiplier	1.17	1.27